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COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING AND BUILDING
STAFF REPORT

PLANNING COMMISSION

Promoting the wise use of land
Helping build great communities

MEETING DATE	CONTACT/PHONE	APPLICANT	FILE NO.
July 28, 2005	John Nall Principal Environmental Specialist (805) 781-5010	Unocal Corporation	D890558D

SUBJECT

A request by Unocal Corporation (applicant) to amend Coastal Development Permit/ Development Plan D890558D to allow the transport of up to 860,000 cubic yards (cy) of Non-Hazardous Impacted Soil (NHIS), via truck, from the approximately 2,700-acre Guadalupe Oil Field (project site) to the City of Santa Maria Landfill (Landfill), and to allow for an increase in use of clean sand for backfill from the project, located at the Q4 borrow site (refer to Figures 1 through 3). The County of San Luis Obispo issued Permit D890558D in 1998 after preparation and certification of an EIR that evaluated site-wide restoration.

The Landfill is located approximately 16 miles east of the project site, within the eastern portion of the City of Santa Maria, within the County of Santa Barbara (refer to Figure 4). The NHIS material would be used as cover for expediting closure of active disposal cells at the Landfill (refer to Figure 5). In March 2003 the Regional Water Quality Control Board (RWQCB), after extensive testing and analysis, approved the Landfill to receive NHIS from remediation sites throughout the region. In August 2004, RWQCB issued a project-specific authorization for NHIS to be accepted at the Landfill from the project site. The RWQCB determined that Unocal's contaminated soil qualifies under the Landfill's existing NHIS disposal and Landfill closure program. Generally, NHIS material includes, but is not limited to, soil from oil field sumps, tank farms, pipeline leaks, or petroleum product spills. NHIS from the project site primarily consists of diluent-affected material with a smaller percentage of material consisting of soil or sand contaminated with crude oil (referred to as "sump material"). The objective of the proposed project is to remove the NHIS from the environmentally sensitive areas of the project site and move it to a location where it can be contained and controlled.

All sources of NHIS material accepted at the Landfill must have proper engineering properties for use as disposal cell closure material, shall undergo the appropriate sampling protocol, and the hydrocarbon fractions in the NHIS shall not exceed concentrations specified by the RWQCB. In May 2004, the applicant submitted testing results of the materials found at the project site to the RWQCB. Based on these results, the RWQCB determined that project site materials meet the acceptance criteria of the Landfill's NHIS program.

To determine the quantities of material to be transferred to the Landfill that should be considered under the proposed project, the sump material and NHIS were separated into individual categories. All sump material from both previous and future excavations on the project site is referred to as Category A material (approximately 200,000 cy). Sump material is not considered suitable for treatment, and disposal at a landfill is therefore the only option. Diluent-affected material has been separated into Categories B and C. Category B includes material from previous excavations (approximately 380,000 cy), most of which is currently stockpiled at two separate locations at the project site (refer to "Project History" section below for summary of past excavations and stockpiling of NHIS at the project site). Category C includes the estimated 280,000 cy of diluent-affected material anticipated from remaining excavation sites.

A 10 percent contingency factor has been added to account for the degree of uncertainty in the above volume estimates (bringing the total to 860,000 cy), to ensure that estimates are conservative, and to ensure that additional review will not be required when excavations commence.

Because there would be a net loss of soil (NHIS) from the project site through transfer to the Landfill, the proposed project results in the need for removing additional sand from the Q4 borrow site to provide clean backfill for excavated areas. The applicant has proposed the use of additional clean sand from the above referenced Q4 borrow site, located at the project site (refer to Figure 3). Use of 500,000 cy of Q4 sand for backfill was evaluated by the County in the 1998 EIR and approved as part of Permit D890558D. The proposed project includes the use of an additional 500,000 to 1,000,000 cy of Q4 sand for backfill. Q4 is a large sand dune with an estimated volume of 9,600,000 cy. To date, the applicant has used approximately 200,000 cy as clean backfill for excavation areas. Sand removed from the Q4 borrow site would be transported by truck to various locations throughout the project site.

The construction phase of the proposed project would include mobilization or transportation of loading operations equipment to the project site (e.g., front-end loaders, bulldozers, etc.), widening and repair of roadways on and adjacent to the project site to accommodate the large trucks transporting NHIS material, loading of NHIS materials into trucks for transport to the Landfill, and loading and transport of Q4 borrow site material for backfill of excavation areas.

The operational phase of the proposed project consists of bringing trucks to the project site to be loaded with NHIS at either of the two existing stockpile locations or to future excavation sites (previously evaluated and approved as part of Permit D890558D). Prior to loading NHIS material and/or upon receipt of NHIS at the Landfill, the applicant would be required to implement an approved sampling plan to again ensure that material transported to the Landfill meets the NHIS program acceptance criteria. Material that does not meet the acceptance criteria would either remain at the project site or be returned to the project site for temporary treatment by natural attenuation and ultimately transferred to a Class II landfill permitted to receive materials that do not meet the acceptance criteria (e.g., the Kettleman Hills, Buttonwillow, or McKittrick facilities).

Trucks used to transport NHIS to the Landfill would be large 18-wheel dump trucks that have a capacity of between 8 to 18 cy each. The trucks would travel on one of three designated routes between the project site and the Landfill (refer to Figure 6). The choice of route would intermittently vary depending upon weather, ever-changing impacts to urban and other populations, and the need to address other traffic-related issues on a daily basis. Hauling of NHIS material is projected to occur over a three-year period; however, a range of two to four years was included to account for scheduling issues. Utilization of 18-cy trucks would result in 150 round trips (300 one-way) per day during peak periods of activity. This equates to a total of 47,779 total one-way truck trips during the projected three-year period.

The proposed project is within the Rural Lands and Recreation land use categories (refer to Figures 7 and 8) and is located at 2184 West Thornberry Road, approximately 0.25 mile west of the intersection of Thornberry Road and Highway 1, throughout various locations within the 2,700-acre oil field, within the Nipomo Dunes System, and approximately three miles west of the City of Guadalupe. A majority of the site is located in the southwest corner of San Luis Obispo County with a small portion extending into the northern portion of Santa Barbara County.

RECOMMENDED ACTION

1. Approve amendment to the 1998 Coastal Development Permit/Development Plan D890558D based on the findings listed in Exhibit A and the conditions listed in Exhibit B.
2. Certify the Final Supplemental Environmental Impact Report (FSEIR) in accordance with the applicable provisions of the California Environmental Quality Act, Public Resources Code Section 21000 et seq.

ENVIRONMENTAL DETERMINATION

Also to be considered at the hearing will be certification of the Environmental Document prepared for the project. The Environmental Coordinator, after completion of the initial study, found that there was evidence that the project may have a significant effect on the environment, and therefore a Final Supplemental Environmental Impact Report (FSEIR) was prepared (pursuant to Public Resources Code Section 21000 et seq., and CA Code of Regulations Section 15000 et seq.) for this project. The FSEIR addresses potential impacts on: Surficial Geology and Coastal Geomorphology; Surface and Groundwater Quality; Onshore Biological Resources; Visual Resources; Air Quality; Transportation and Circulation; Noise; Land Use and Recreation; Cultural Resources; Agricultural Resources; and, Public Safety. Mitigation measures are proposed to address and mitigate these impacts to a level of insignificance and are included as conditions of approval.

LAND USE CATEGORY	COMBINING DESIGNATION	ASSESSOR PARCEL NUMBERS	SUPERVISOR DISTRICT(S)
Recreation Rural Lands	Energy & Extractive Area, Flood Hazard, Sensitive Resource Area, Terrestrial Habitat, Local Coastal Plan	092-041-001, 092-041-003, 092-041-004, 092-041-005, 092-041-006, 092-051-002	4

PLANNING AREA STANDARDS:

South County Rural Area Standards: Areawide. Circulation 1. Areawide Systems – Development Plan Projects

South County Rural Area Standards: Combining Designations. Energy and Extractive. 4. Permit Requirement

South County Rural Area Standards: Combining Designations. Local Coastal Plan. 6. Union Oil

South County Rural Area Standards: Combining Designations. Santa Maria River. 10. Habitat Protection

South County Rural Area Standards: Combining Designations. Santa Maria River. 12. Setbacks Requirements

South County Rural Area Standards: Rural Lands. Guadalupe Dunes Oilfield. 1. Limitation on Use

LAND USE ORDINANCE STANDARDS:

Section 23.04.420 – Coastal Access

Section 23.05.036 – Sedimentation and Erosion Control

Section 23.05.140 – Archaeological Resources Discovery

Section 23.06.040 – Noise Standards

Section 23.06.082 – Air Pollution Control District Review

Section 23.06.084 – Odors

Section 23.06.102 – Regional Water Quality Control Board (RWB) Review

Section 23.06.126 – Flammable and Combustible Liquids Storage

Section 23.07.040 – Energy and Extractive Resource Area (EX)

Section 23.07.060 – Flood Hazard Area (FH)

Section 23.07.104 – Terrestrial Habitat Protection

EXISTING USES:

Remediation, research, and restoration

SURROUNDING LAND USE CATEGORIES AND USES:

North: Recreation/Preserved dune land and coastal recreation
East: Agriculture/Row crops
South: Rural Lands/Santa Maria River, County park, grazing
West: Pacific Ocean

OTHER AGENCY / ADVISORY GROUP INVOLVEMENT:
As part of the SEIR Notice of Preparation, the project was referred the following agencies and interest groups: Air Pollution Control District; County Clerk; County Counsel; County Public Works Department; County Fire Department; Division of Environmental Health; Office of the Sheriff-Coroner; SLO County Integrated Waste Management Authority; SLO Council of Governments; County Agricultural Commissioner; District 4 Supervisor – Katcho Achadjian; Nipomo Community Advisory Council; CA Air Resources Board; CA Coastal Commission, Central Coast Area Office; CA Coastal Conservancy; CA Department of Conservation – Division of Oil and Gas, and Division of Mines and Geology; CA Department of Fish and Game; CA Department of Transportation (Caltrans); CA Energy Commission; CA Regional Water Quality Control Board; CA Department of Water Resources; Native American Heritage Commission; Office of Planning and Research; State Clearinghouse; State Lands Commission; State Water Resources Control Board; CA Department of Parks and Recreation; National Marine Fisheries Service; U.S. Army Corps of Engineers; Natural Resources Conservation Service; U.S. Department of Energy; U.S. Fish and Wildlife Service; Nipomo Community Services District; Lucia Mar School District; City of Santa Maria; City of Guadalupe; County of Santa Barbara; Environmental Center (ECOSLO); Environmental Defense Center (EDC); League of Women Voters; Agriculture Task Force; CA Native Plant Society; Land Conservancy; Life on Planet Earth; The Nature Conservancy; Save the Mesa; Office of Public Archaeology (UCSB); and, SLO County Chumash Council.

TOPOGRAPHY:	VEGETATION:
Moderately rolling with some steeply sloping sand dune areas	Coastal Dune Scrub; Freshwater Marsh/Wetlands; Riparian; Dune Swale; Riverine; Disturbed/Degraded Grassland
PROPOSED SERVICES: Water supply: On-site wells Sewage Disposal: Not applicable Fire Protection: CDF/County Fire Department	ACCEPTANCE DATE: July 5, 2005

PROJECT HISTORY

The principal land use at the project site, from 1946 to March 1994, was the production of oil and natural gas. In the 1950's, a petroleum hydrocarbon referred to as diluent was introduced at the project site to assist in the production of heavy crude oil and use ceased in 1990. Over the years of its use and storage, diluent was inadvertently released from pipelines and storage tanks. Diluent sources are now present in soils and diluent plumes are present in ground water at multiple locations throughout the project site. Since detection of diluent contamination, extensive assessment activities to characterize and delineate the underground hydrocarbons as well as pilot studies to test the effectiveness of various remediation methods have been conducted at the project site.

In March 1998, the County certified an EIR (1998 EIR) that evaluated the impacts and determined mitigation measures for a wide variety of remedial actions, including excavation of diluent sources and treatment methods for the excavated material. Several treatment methods were evaluated in the 1998 EIR, including the use of an on-site Thermal Desorption Unit (TDU) and a Land Treatment Unit (LTU) as tools to remediate contaminated soil excavated from the project site during the restoration process.

In November 1998, the RWQCB issued Clean-up and Abatement Order (CAO 98-38) that mandates excavation of remediation contaminated soils at the project site -- including the excavation of specific areas of contamination consistent with the 1998 EIR.

Excavation of contaminated materials began at the project site in October 1999 with the intent of treating contaminated soil on-site over an extended period of time using the Land Treatment Unit method. The excavated material was stockpiled at two locations on-site (TB8 and TB9) and some of the material was used to conduct LTU pilot feasibility studies. During this time, clean sand from the Q4 borrow site was being used to backfill excavated plume and sump areas (approved as part of the 1998 EIR). In late 2000, Unocal and responsible agencies determined that it might not be feasible to use the LTU-treated material as backfill because of the risk of some level of intermediary toxicity being transferred to water in contact with the LTU soil that was in the process of being treated. Because the use of treated material as backfill for excavations would involve placement of the soil in saturated conditions adjacent to wetland areas, Unocal and responsible resource agencies agreed that the LTU method should be abandoned, excavation should be halted, and alternative treatment/disposal methods should be evaluated and implemented.

Unocal and the Multi-Agency Coordination Committee, (MACC) consisting of the RWQCB, Coastal Commission, Department of Fish and Game, U.S. Fish and Wildlife Service, and other responsible agencies, agreed that the best approach to determining an acceptable treatment/disposal method, other than LTU, would be to conduct environmental review for several feasible treatment/disposal methods in a supplemental document to the 1998 EIR (refer to Figure 9). The appropriate environmental document was determined to be a SEIR and preparation of this document was initiated in 2003 after Unocal decided to pursue the transport of up to 860,000 cubic yards of NHIS to the Landfill as their "proposed project". The objectives of the 2005 SEIR are to evaluate the impacts of the proposed project and evaluate impacts to several alternatives to the proposed project.

PROJECT ANALYSIS

Coastal Zone Land Use Ordinance Compliance

The proposed project's conformity with applicable Coastal Zone Land Use Ordinance (CZLUO) Site Design Standards, Site Development Standards, Operation Standards, and Combining Designation Standards are as follows:

1. Section 23.04.420 – Coastal Access: This site design standard requires that development within the coastal zone between the first public road and the tidelands shall protect and/or provide coastal access.

   Staff Comment: The proposed project would not interfere with the public's access and use of the beach west of the site. Additionally, Unocal has acquired the former oil field from the LeRoy Trusts, and, as required by existing 1998 CDP/DP Conditions of Approval (1998 COAs), recorded Offers to Dedicate for a conservation easement over the remainder of the project site, thereby ensuring some form of future increased level of public access.

2. Section 23.05.036 – Sedimentation and Erosion Control: This site development standard generally requires submittal of a sedimentation and erosion control plan for grading occurring during the wet season, when land disturbance activities result in removal of over 0.5-acre of native vegetation, when grading on slopes greater than 30%, and when grading could result in impacts to water bodies and flora or fauna.

   Staff Comment: The proposed project consists of road widening activities in various locations on the project site and excavation of clean sand from the Q4 dune for backfill. These activities would result in removal of native vegetation and modification of

sedimentation and erosion patterns due to alteration of topography. The applicant would be required to prepare and submit a sedimentation and erosion control plan and to implement mitigation measures specified in the SEIR that would further reduce sedimentation and erosion impacts (e.g., setting-back areas of clean sand excavation from vegetated areas and monitoring of excavation process).

3. Section 23.05.140 – Archaeological Resources Discovery: This site development standard requires that project-related activities cease should archaeological resources be discovered or unearthed during the course of the project and that the proper authorities be contacted to evaluate and determine the proper course of action.

   Staff Comment: The proposed project would result in disturbance of previously undisturbed areas through widening and paving of existing roadways on the project site. Areas of widening have been surveyed by a qualified archaeologist and it has been determined that impacts are unlikely due to these areas of the site being of low archaeological sensitivity. Road widening and ground disturbance activities would be required to be monitored and, in the event resources are found, a qualified individual would be required to be contacted.

4. Section 23.06.040 – Noise Standards: This operational standard specifies how noise is to be measured, specifies allowable interior and exterior noise level standards, and is designed to protect people from excessive noise levels. This section also specifies exemptions to noise standards (e.g., construction occurring during the week from 7 A.M. to 9 P.M. and on the weekends from 8 A.M. to 5 P.M.).

   Staff Comment: The proposed project would result in increased noise levels in areas of the project site and along the transport routes to and from the Landfill. The projected increase in noise levels would be minimal and do not result in an increase above established noise standards in both San Luis Obispo and Santa Barbara Counties. In addition, applicable permit conditions from D890558D would apply and further mitigate potential noise impacts to a level of insignificance (e.g., limitation of construction from between 7 A.M. to 9 P.M. during the week to the extent practicable, notification of project commencement to local communities and potential noise receptors, etc.).

5. Section 23.06.082 – Air Pollution Control District Review: This operational standard establishes that the APCD be notified when new development is proposed to include equipment or activities that involve combustion and/or storage or use of hydrocarbons or other air contaminants.

   Staff Comments: During review, evaluation, and preparation of the SEIR for the proposed project, the APCD has been in continual contact with the County Department of Planning and Building and the project applicant through response to initial project referrals, attendance at multi-agency coordination and communication meetings, and response to comments during the public comment period for the Draft SEIR.

6. Section 23.06.084 – Odors: This operational standard requires that any non-agricultural land use conducted with one-half mile of any urban or village reserve line is to be so operated as not to emit matter causing noxious odors which are perceptible at or beyond the lot line of the project site.

   Staff Comment: The proposed project consists of loading NHIS material and backfilling with clean sand within areas of the project site and transporting the NHIS material to the Landfill. These activities would result in generation of noxious odors such as diesel exhaust, both on the project site and along the transfer routes, which would be perceptible. The SEIR

evaluated the health risks associated with diesel exhaust emissions and found that through implementation of APCD recommended mitigation measures (i.e., implementation of an Emissions Reduction Plan and funding of an air-emission-reduction program), impacts would be considered insignificant.

7. Section 23.06.102 – Regional Water Quality Control Board (RWQCB) Review: This operational standard establishes procedures for notification of the RWQCB when a new land use or development has the potential to affect groundwater quality.

   Staff Comments: During review, evaluation, and preparation of the SEIR for the proposed project, the RWB has been in continual contact with the County Department of Planning and Building and the project applicant through response to initial project referrals, attendance at multi-agency coordination and communication meetings, and response to comments during the public comment period for the Draft SEIR.

8. Section 23.06.126 – Flammable and Combustible Liquids Storage: This operation standard specifies that storage of flammable or combustible liquids is subject to permitting, limitations on quantity, location of storage, and setbacks.

   Staff Comments: The proposed project would not result in the storage of any flammable or combustible liquids at the project site.

9. Section 23.07.040 – Energy and Extractive Resource Area (EX): This combining designation standard is used to identify areas within the County where mineral or petroleum extraction occurs or is proposed to occur and is designed to protect significant resource extraction and energy production areas from encroachment of non-compatible land uses.

   Staff Comments: The project site is no longer considered a viable petroleum resource extraction site. Should the project site be deemed a viable future petroleum resource extraction site, the proposed project would not represent a long-term land use that would affect this land use designation in the long term.

10. Section 23.07.060 – Flood Hazard Area (FH): This combining designation standard is used to identify areas where flood hazards could affect life and property and where development could affect drainage and waterways.

    Staff Comments: The proposed project would not be located within those areas of the project site with the Flood Hazard designation and would not affect drainage or waterways where flood hazards could occur. The project also would not be affected by flood hazards that could affect life and property.

11. Section 23.07.104 – Terrestrial Habitat Protection (TH): This combining designation standard is used to protect and preserve rare and endangered species of terrestrial plants and animals by preserving their habitats. This standard also specifies use of native plants where vegetation is removed and installation of barriers to protect surrounding habitat during construction.

    Staff Comments: The proposed project would result in the removal of approximately two acres of backdune habitats, including dune scrub, open sand, and disturbed areas. These activities would not encroach on dune swale habitats, marine habitats, wetland sites, or any other habitat type located on the project site. The project applicant would be required to mitigate for the loss of backdune habitat through restoration of an equally sized area and would be required to follow habitat restoration guidelines approved as part of the 1998 EIR.

In addition, the applicant would be required to restrict any hauling activities along the Main Road Entrance wetlands during the California red-legged frog (CRLF) migration period until the Sensitive Species Management Plan has been revised to protect CRLF and other non-listed sensitive and common wildlife species. Revisions to the Plan would include speed limit restrictions for vehicles and trucks, surveys of roadways and surrounding areas several times per day during the wet season, and halting hauling activities within specific locations of haul routes if a substantial number of mortalities occur. Successful implementation of the above measures would reduce impacts to rare and endangered species and their habitats to a level of insignificance, resulting in the project's consistency with this combining designation.

Coastal Plan Policy Analysis

The proposed project's conformity with applicable Coastal Plan Policies are as follows:

POLICIES FOR SHORELINE ACCESS

Policy 1: Protection of Existing Access
This policy provides protection for the possible existence of public prescriptive rights as required by the Coastal Act. Development shall not interfere with the public's right of access to the sea where acquired through historic use or legislative authorization. These rights shall be protected through public acquisition measures or through permit conditions which incorporate access measures into new development.

Staff Comments: This policy shall be implemented as a standard and pursuant to Section 23.04.420 of the CZLUO. For the project's consistency with this section, refer to above CZLUO Staff Comments.

POLICIES FOR ENERGY AND INDUSTRIAL DEVELOPMENT

Existing petroleum extraction and processing facilities within the county coastal zone are presently limited to the Guadalupe Dunes. Policy 2 ("Exploration and Production Wells") applies to all future or expanded petroleum extraction operations and processing facilities in the coastal zone and is therefore not related to the proposed project. Policy 3 (Abandonment of Facilities) is addressed below.

Policy 3: Abandonment of Facilities
Upon completion or abandonment, all above-ground oil production and processing facilities shall be removed from the site, and the area in which they were located shall be restored.

Staff Comments: The proposed project would remove NHIS storage from the project site and would contribute to the overall remediation and restoration of the project site and the return to its previous condition. The project would be considered consistent with this policy.

POLICIES FOR ENVIRONMENTALLY SENSITIVE HABITATS

Policy 1: Land Uses Within or Adjacent to Environmentally Sensitive Habitats
New development within or adjacent to locations of environmentally sensitive habitats shall not significantly disrupt the resource. Within an existing resource, only those uses dependent on such resources shall be allowed within the area.

Policy 3: Habitat Restoration
The County or Coastal Commission should require the restoration of damaged habitats as a condition of approval when feasible.

Policy 29: Protection of Terrestrial Habitats
Designated plant and wildlife habitats are environmentally sensitive habitat areas and emphasis for protection should be placed on the entire ecological community.

Policy 36: Protection of Dune Vegetation
Disturbance of any dune vegetation shall be limited to those projects which are dependent upon such resources where no feasible alternatives exist and then shall be limited to the smallest area possible.

Staff Comments: These policies shall be implemented as standards and pursuant to Sections 23.04.170-178 of the CZLUO. For the project's consistency with this section, refer to above CZLUO Staff Comments.

POLICIES FOR AGRICULTURE

Policy 1: Maintaining Agricultural Lands
This policy specifies that prime agricultural land be maintained, in or available for, agricultural production.

Staff Comment: The proposed project would result in impacts to prime agricultural land located along the primary access road leading to the project site (i.e., Thornberry Road). Impacts would result due to increased truck trips hauling NHIS and the potential for conflicts with farm equipment, and from the widening of Thornberry Road which would result in the removal of 0.6-acre of prime farmland. The SEIR evaluated these impacts and determined that impacts could be mitigated to a level of insignificance through stockpiling of prime agriculture land soil, restoration of the prime farmland back to pre-project condition, and through implementing traffic control measures that ensure avoidance of conflicts between NHIS trucks and farm equipment. These measures include delineating an access driveway for farm equipment that cannot be blocked by NHIS trucks and by notifying farmers adjacent to the project site prior to project activities that would result in greater than 100 truck haul round-trips per day. With implementation of the above measures, the proposed project would be consistent with this policy.

POLICIES FOR VISUAL AND SCENIC RESOURCES

Policy 1: Protection of Visual and Scenic Resources
Unique and attractive features of the landscape, including but not limited to unusual landforms, scenic vistas and sensitive habitats are to be preserved, protected, and in visually degraded areas restored where feasible.

Policy 2: Site Selection for New Development
Permitted development shall be sited so as to protect views to and along the ocean and scenic coastal areas. Wherever possible, site selection for new development is to emphasize locations not visible from major public view corridors. In particular, new development should utilize slope created "pockets" to shield development and minimize visual intrusion.

Policy 5: Landform Alterations
Grading, earthmoving, major vegetation removal, and other land form alterations within public view corridors are to be minimized. Where feasible, contours of the finished surface

are to blend with adjacent natural terrain to achieve a consistent grade and natural appearance.

Policy 7: Preservation of Trees and Native Vegetation
The location and design of new development shall minimize the need for tree removal. When trees must be removed to accommodate new development, the site is to be replanted with similar species or other species which are reflective of the community character.

Policy 10: Development on Beaches and Sand Dunes
Prohibits new development on open sandy beaches, except facilities required for public health and safety (e.g., beach erosion control structures). Requires permitted development to minimize visibility and alterations to the natural landform and minimize removal of dune stabilizing vegetation.

Staff Comments: A portion of the proposed project is within a highly sensitive public viewshed. These views are primarily from the entrance road serving the County park located to the south of the project site and from the beach areas extending from the County park to the north. No components of the project are visible from populated areas or roadways located to the east. The SEIR identified the proposed project as having temporary and short-term visual impacts resulting from the presence and operation of construction equipment for loading and transport of NHIS from the one of the two existing excavated material stockpiles (i.e., TB8). Due to the presence of existing equipment within this viewshed, the relative large distance at which the equipment associated with the proposed project would be viewed (approximately 1,500 feet at the closest point), and the short-term nature that the equipment would be in the viewshed (two to four years), the impacts relating to visual and scenic resources would be considered insignificant and the project would be considered consistent with the above policies.

POLICIES FOR ARCHAEOLOGICAL RESOURCES

Policy 1: Protection of Archaeological Resources
The County shall provide for protection of both known and potential archaeological resources. All available measures shall be explored to avoid development of important archaeological sites. Where these measures are not feasible, adequate mitigation shall be required.

Policy 4: Preliminary Site Survey for Development within Archaeologically Sensitive Areas
Development shall require a preliminary site survey by a qualified archaeologist knowledgeable in Chumash culture prior to determination of potential impacts of the project.

Policy 6: Archaeological Resources Discovered During Construction or Through Other Activities
Where substantial archaeological resources are discovered during construction, all activities shall cease until a qualified archaeologist knowledgeable in the Chumash culture can determine the significance of the resource and submit alternative mitigation measures.

Staff Comments: The proposed project would result in disturbance of previously undisturbed areas through widening and paving of existing roadways on the project site. Areas of widening have been surveyed by a qualified archaeologist and it has been determined that impacts are very unlikely because the sands adjacent to the specific roadways to be widened are not representative of areas where prehistoric populations would have lived. Road widening and ground disturbance activities would be required to be monitored and, in the event resources are found, a qualified individual would be required to be contacted. The qualified archaeologist would recommend, if necessary, additional

mitigation measures to be implemented. Based on the low level of sensitivity and the mitigation measures recommended above, the project would be consistent with above policies.

POLICIES FOR AIR QUALITY

Policy 1: Air Quality
The County will provide adequate administration and enforcement of air quality programs and regulations to be consistent with the county's Air Pollution Control District and the State Air Resources Board.

Staff Comments: Through administration and preparation of the SEIR for the proposed project, the County has provided a means by which the APCD has been able to determine the project's consistency with state and local air pollution control regulations and to recommend mitigation measures where the impacts are required to ensure the project's consistency with applicable programs and regulations.

MODIFICATIONS

No modifications of the Coastal Zone Land Use Ordinance are proposed.

PLANNING AREA STANDARDS

SOUTH COUNTY RURAL AREA STANDARDS

Areawide (Circulation)

1. Areawide Systems – Development Plan Projects.
Development Plan proposals are to be integrated into areawide circulation and utility easements, providing for future extensions into adjacent undeveloped properties wherever feasible or where known areawide rights-of-way are planned.

Staff Comments: The proposed project is temporary and would last for a period of two to four years and the project's long-term use would be that of permanent open space. Therefore, integration into areawide circulation and utility easements that provide for future extensions into adjacent undeveloped properties is not practicable and the project would be considered in compliance with this standard.

Combining Designations (Energy and Extractive)

4. Permit Requirement – Guadalupe Oil Field.
Any new oil field operation, modification or expansion of the existing Guadalupe Oil Field, beyond that allowed by current Coastal Commission permits requires Development Plan approval.

Staff Comments: The proposed project consists of a disposal method of contaminated soil for which permits have not been issued or modified by lead and responsible agencies (i.e., the County of San Luis Obispo and California Coastal Commission). The project applicant, through this land use application, is seeking to amend their existing Coastal Development Permit/Development Plan (CDP/DP). The SEIR prepared for the project evaluates proposed amendments to the project and the existing permit and finds that significant impacts would

not result. Upon approval of the existing CDP/DP, the project would be considered consistent with this standard.

Combining Designations (Local Coastal Plan)

6. Union Oil.
In accordance with the Coastal Development Permit Union Oil shall record an irrevocable offer-to-dedicate to a public agency or private association, an easement primarily for habitat protection/preservation or open space and secondarily for public access consistent with preserving the habitat value of this area.

Staff Comments: The project applicant (Unocal) has recorded an irrevocable offer-to-dedicate (OTD) an easement for habitat preservation and open space over the entire 2,700-acre Guadalupe Oil Field. This occurred in 2004 and Unocal is currently working with the U.S. Fish and Wildlife Service, the potential future manager of the easement/project site, to determine whether the Service will assume management responsibility. The proposed project would be in compliance with this standard.

Combining Designations (Santa Maria River)

10. Habitat Protection.
No oil field discharge shall be allowed into the wetland.

Staff Comments: The proposed project consists of removing NHIS and disposing of it at the Landfill. Discharge into Santa Maria River wetlands on and adjacent to the project site would not occur due to the significant distances that proposed activities involving NHIS would be setback from these areas. The proposed project would be in compliance with this standard.

12. Setback Requirements.
Oil field tailings and debris shall not be located within 100 feet of the wetland. Existing tailings and debris shall be removed.

Staff Comments: NHIS would not be located within 100 feet of Santa Maria wetlands. Under the proposed project, this material would be loaded into trucks and transported off-site to the Santa Maria Landfill. The proposed project would be in compliance with this standard.

Rural Lands (Guadalupe Dunes Oilfield)

1. Limitation on Use.
Uses allowed by Coastal Table O of the Land Use Element and Local Coastal Plan are limited to: agricultural accessory structures; aquaculture; crop production and grazing; coastal accessways; fisheries and game preserves; water wells and impoundments; petroleum extraction; accessory storage; pipelines and power transmission.

Staff Comments: The proposed project does not consist of a "new use" and is a continuation/modification of the previously permitted use that consists of remediation and restoration. Future uses of the project site, due to the recently recorded OTD, would be consistent with the above uses (e.g., coastal accessways, open space). The proposed project would be in compliance with this standard.

COMBINING DESIGNATIONS

The Land Use Element and Local Coastal Plan, South County Planning Area shows the following Combining Designations as being applicable to the project site (refer to Figure 7): Energy and Extractive Area; Flood Hazard; Sensitive Resource Area; Terrestrial Habitat; and Local Coastal Plan. These combining designations and the proposed project's consistency with them are addressed in the above sections (refer to Coastal Zone Land Use Ordinance and Land Use Element and Local Coastal Plan, South County Planning Area Analysis sections).

ENVIRONMENTAL DETERMINATION

Through preparation of the SEIR, all significant environmental impacts associated with the proposed project have been mitigated to a level of insignificance.

AGENCY REVIEW

The following agencies provided comments on the proposed project during the public comment period for the Draft SEIR. These comments are addressed and available for review in the Final SEIR (refer to Section 10.0) and responses to agency comments have been sent to each agency. A summary of each agency's main comments is provided below.

California Department of Fish and Game (CDFG) – This letter states that Unocal shall prepare a sensitive species management plan, that CDFG should be included as a reviewing and approval agency for mitigation plans, NHIS not meeting testing standards shall be returned to the project site for remediation and not disposed of at the Landfill, the SEIR shall address potential impacts to the Santa Maria River due to trucks carrying NHIS crossing the river, and incorporate reference of the USFWS National Wildlife Refuge that may accept the easement and allow increased public access to the project site.

San Luis Obispo County Department of Public Works, Solid Waste Coordinator – This letter states that Unocal should be required to obtain written assurances from the California Integrated Waste Management Board that the County of San Luis Obispo's compliance with the Integrated Waste Management Act and will not affect waste disposal goals as a result of use of NHIS from the project site as closure material at the Landfill.

San Luis Obispo County Integrated Waste Management Authority – This letter states that all of the benefits achieved by the County's comprehensive landfill diversion programs (source reduction, reuse, recycling) could be eliminated by this project. At no time should any of the NHIS be "disposed of" in a landfill. However, the use of NHIS as "cover material" at the Landfill would not be detrimental because it would not impact remaining Landfill capacity.

Santa Barbara County Public Works Department – This letter states that the proposed project would generate large numbers of trucks on Santa Barbara County maintained roads, traffic safety impacts on County of Santa Barbara Roads should be evaluated, and mitigation should be provided to address roadway impacts and repair of County roads to pre-project conditions.

San Luis Obispo County Air Pollution Control District – This letter states that the APCD supports the proposed project (i.e., the short distance Santa Maria Landfill disposal option) as long as appropriate air quality mitigation is implemented. APCD also prefers 18 cubic yard trucks be used to reduce the number of truck trips and that the Division Route be used to minimize diesel toxic impacts. Specific comments made by APCD were related to technical revisions to the air

emission modeling, significance criteria used for construction and health risks, and recommendations for minor revisions to mitigation measures, deletion of mitigation measures, and inclusion of mitigation measures. Comments relating to mitigation measures were aimed at further reducing air emissions.

Santa Barbara County Air Pollution Control District – This letter states that Santa Barbara County APCD supports the comments summarized in the above referenced letter prepared by the San Luis Obispo County APCD and they concur with the methodology used to evaluate the average daily emissions of NOx in the air basin and they support the proposed mitigation of the total excess NOx emissions of 90 tons.

California Regional Water Quality Control Board – This letter states the following: "Overall, we concur with the preferred alternative for managing non-hazardous impacted soil (NHIS) form the Guadalupe Oil Field (GOF)" and "From a water quality perspective, it appears to be the most environmentally practicable way of managing soil resulting from GOF excavations as well as being protective of water quality both at the GOF and the Santa Maria landfill itself." This concurrence is based on extensive communication between RWQCB and the Landfill regarding the acceptability of NHIS from the project site being disposed of at the Landfill and the need to have Unocal complete excavations specified in the Clean-up and Abatement Order issued in 1998. Other comments made in this letter relate to proposed minor corrections and clarifications of the proposed project as well as the alternatives evaluation.

LEGAL LOT STATUS:

The three (3) lots were legally created by deed at a time when that was a legal method of creating lots.

Staff report prepared by Bill Henry, Morro Group, Inc.
reviewed by John Nall, County of San Luis Obispo

FINDINGS - EXHIBIT A

Environmental Determination

A. The Environmental Coordinator, after completion of the initial study, found that there was evidence that the project may have a significant effect on the environment, and therefore a Final Supplemental Environmental Impact Report (FSEIR) was prepared (pursuant to Public Resources Code Section 21000 et seq., and CA Code of Regulations Section 15000 et seq.) for this project. A notice of preparation (NOP) for the SEIR was distributed in January 2003 to federal, state, and local agencies, the State Clearinghouse, organizations, and interested individuals. The FSEIR was prepared by MRS, Inc., a County-qualified environmental impact report consultant. The FSEIR addresses potential impacts on: Surficial Geology and Coastal Geomorphology; Surface and Groundwater Quality; Onshore Biological Resources; Visual Resources; Air Quality; Transportation and Circulation; Noise; Land Use and Recreation; Cultural Resources; Agricultural Resources; and, Public Safety. Mitigation measures are proposed to address and mitigate these impacts to a level of insignificance (Class II Impacts) and are included as conditions of approval.

Development Plan

B. The proposed project is consistent with the San Luis Obispo County General Plan and Local Coastal Plan because restoration and remediation is considered the final phase of use of the project site as an "Energy and Extraction" use and as conditioned is consistent with all of the General Plan policies.

C. As conditioned, the proposed project satisfies all applicable provisions of Title 23 of the County Code.

D. The establishment and subsequent operation or conduct of the proposed project will not, because of the circumstances and conditions applied in the particular case, be detrimental to the health, safety or welfare of the general public or persons residing or working in the neighborhood of the use, or be detrimental or injurious to property or improvements in the vicinity of the use because, as identified in the FSEIR, adverse unavoidable significant impacts will not result and potentially significant impacts relating to water quality, biological resources, air quality, agricultural resources, and public services will be mitigated to a level of insignificance.

E. The proposed project will not be inconsistent with the character of the immediate area or contrary to its orderly development because it will result in the restoration of the site to pre-oil development conditions, which were in themselves inconsistent with surrounding agricultural, open space, and recreational character.

F. The proposed project will not generate a volume of traffic beyond the safe capacity of all roads providing access to the project, either existing or to be improved with the project for the following reasons: 1) Trucks hauling NHIS from the project site to the Landfill would be required to utilize specific routes that avoid congested urban areas such as the City of Santa Maria; 2) trucks would be restricted from travel between the project site and the Landfill on Betteravia Road between the hours of 4:30 p.m. and 5:30 p.m.; 3) the applicant would be required to update the existing Traffic Control Plan that details specific truck trip vehicle routes, peak hour and route restrictions, road surface maintenance, and traffic safety; and, 4) the project is short-term in nature and would last between two to four years.

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Sensitive Resource Area

G. The proposed project will not create significant adverse effects on the natural features of the site or vicinity that were the basis for the Sensitive Resource Area designation, and will preserve and protect such features through the site design, because the applicant would be required to mitigate impacts to two acres of backdune habitat by implementing the restoration of an equal number of acres of habitat at other currently disturbed or degraded locations within the project site (such as areas degraded by infestations of invasive species). The applicant would be required to implement habitat restoration under the guidelines of the approved Habitat Revegetation, Restoration, and Monitoring Plan (approved as part of permit number D890558D, Condition F.64).

In addition, the applicant would be required to restrict any hauling activities along the Main Road Entrance wetlands during the California red-legged frog (CRLF) migration period until the Sensitive Species Management Plan has been revised to protect CRLF, and other non-listed sensitive and common wildlife species. Revisions to the Plan would include speed limit restrictions for vehicles and trucks, surveys of roadways and surrounding areas several times per day during the wet season, and halting hauling activities within specific locations of haul routes if a substantial number of mortalities occur.

Archeological Sensitive Area

H. The site design and development (road widening) incorporate adequate measures to ensure that archeological resources will be acceptably and adequately protected because the applicant proposes to widen roadways within the project site that are located in areas that are considered to have very low archaeological sensitivity, as determined by a County-qualified archaeologist. Road widening activities would disturb approximately 8,600 linear feet of roadway area and the top 12 inches of an area approximately 10 feet in width. These activities would be required to be monitored by a County-qualified monitor and if archaeological resources are located, work would be required to be temporarily redirected and halted until a qualified archaeologist can make further recommendations.

EX - Combining Designation

I. The proposed use will not adversely affect the continuing operating or expansion of the energy or extraction use because these uses have been discontinued at the project site for approximately 10 years and it has been determined by the applicant, the County, and responsible and trustee agencies that remediation and restoration (i.e., the proposed project) is the appropriate course of action for the project site.

EXHIBIT B - CONDITIONS OF APPROVAL

Approved Development

1. This approval authorizes:

   a. Amendment of Coastal Development Permit/Development Plan D890558 to allow transport up to 860,000 cubic yards (cy) of Non-Hazardous Impacted Soil (NHIS), via truck, from the approximately 2,700-acre Guadalupe Oil Field (project site) to the City of Santa Maria Landfill (Landfill), and to allow for an increase in use of clean sand for backfill from the project, located at the Q4 dune borrow site over a two to four year period.

Surficial Geology and Coastal Geomorphology

2. **Prior to any disturbance activities and/or removal of sand at the Q4 dune borrow site**, edges of the excavation boundary at Q4 should be set back at least 8 meters (26 ft) from the present boundary of established vegetation on adjacent undisturbed slopes. Excavation edge boundary shall be physically delineated in a highly visible, maintainable, and in a no impact manner.

3. **During disturbance and/or sand removal activities at the Q4 dune borrow site**, the position of the angular boundary at the top of the excavated dune area shall be monitored weekly in areas adjacent to the vegetation line while excavation is actively occurring, so that Condition of Approval No. 1 above is not violated.

Surface and Ground Water Quality

4. **Prior to issuance of construction permit**, the applicant shall develop and implement response plans specifically addressing NHIS spills from haul trucks that include the following:

   a. Explicit emergency notification procedures;

   b. Identification of a designated response team;

   c. Procedures for maintenance and clean-up of equipment onsite or near the haul truck route; and,

   d. Driver requirements for completion of the spill response training program.

5. **Prior to issuance of construction permit**, the applicant shall revise the Traffic Control Plan to include the following traffic control measure:

   a. Placing a flagman and traffic cones to prevent haul trucks from passing along narrow portions of the onsite route with non-paved shoulders;

   b. Creating turn-outs to minimize erosion from truck traffic; and,

   c. Installing temporary erosion control measures (e.g., silt fences) as needed, where there are construction activities, along truck routes to minimize dispersion of eroded soils. Added measures are to be implemented during road construction and trucking operations.

6. **During all pre-construction and construction activities**, require licensed professional drivers to operate haul trucks and adhere to the Traffic Control Plan (refer to CDP/DP D890558D, Condition of Approval F.93).

7. **During construction activities**, the applicant, in coordination with the County On-site Environmental Coordinator, shall monitor the effectiveness of current cleaning and decontamination methods for haul trucks leaving loading areas. If monitoring results indicate that the existing practice of using rumble-pads and tire-brushing is not effectively removing soil from haul trucks, the applicant shall implement additional and more effective truck cleanup procedures (e.g., washing each truck following loading, with collection and treatment of wash waters).

8. **During construction activities**, the applicant, in coordination with the County On-site Environmental Coordinator, shall monitor ditches along Thornberry Road that drain agricultural fields and work with the applicable landowner/jurisdictional agency to repair any erosion related to haul truck staging or transport activities.

Biological Resources

9. **Prior to issuance of construction permit**, the applicant shall determine if road-widening activities are required. If so, the applicant shall mitigate loss of backdune habitat and sensitive plant species individuals and habitat and reduce impacts associated with the loss of habitat by implementing the restoration of an equal number of acres of backdune habitat at other currently disturbed or degraded locations within the project site (such as areas degraded by infestations of invasive species). The applicant shall implement habitat replacement using the guidelines of the approved Habitat Revegetation, Restoration, and Monitoring Plan (refer to CDP/DP D890558D, Condition of Approval F.64) for areas restored as a result of road widening. To minimize temporal losses, restoration shall be completed within **90 days after habitat removal disturbance**. The restoration shall be bonded for **prior to removal/disturbance of habitat**.

10. **Prior to issuance conducting hauling activities along the Main Road Entrance wetlands or the M12/L11 Valley during the California red-legged frog migration/breeding season (November 1st through June 1st),** the applicant shall revise the Sensitive Species Management Plan (SSMP) to include measures that would be implemented to protect California red-legged frogs, and other non-listed sensitive and common wildlife species potentially affected by hauling activities near known or potential habitat. The revised SSMP shall be approved by the USFWS, CDFG, and the County On-site Environmental Coordinator and shall include the following:

    a. A permanent speed limit of 15 mph along the main haul road adjacent to dune swale wetlands in the M12/L11 Valley and the Entrance Road wetlands during the California red-legged frog breeding season (i.e., when it is raining, the roads are wet, or after daylight). Signs detailing speed limits shall be posted in appropriate locations along the route;

    b. Survey by biologists of the active portions of the haul route within 200 feet of sensitive resources, including the dune swale wetlands, at least four times per day during hauling activities when it is raining or the roads are wet; and,

    c. Halting of truck hauling activities on the roadways adjacent to dune swale wetlands during the California red-legged frog migration/breeding period if a substantial number of mortalities, identified in the revised SSMP, continue to occur along the haul route after implementing the above mitigation. Hauling activities can be re-initiated once additional protective measures are determined and approved by the

County OEC, USFWS and CDFG or for the duration of the specific migration event (as determined by the applicant and the County On-site Environmental Coordinator) to reduce wildlife mortality.

Transportation/Circulation

11. **Prior to issuance of construction permit,** the applicant shall update the existing Traffic Control Plan (refer to CDP/DP D890558D, Condition F.93) that details specific truck trip vehicle routes to the Landfill, peak hour and route restrictions, road surface maintenance, and traffic safety. The updated Traffic Control Plan shall be approved by the County of San Luis Obispo Department of Public Works in consultation with the County of Santa Barbara Public Works Department, Transportation Division.

12. **During construction activities**, haul truck traffic shall be restricted from travel between the project site and the Santa Maria Landfill on Betteravia Road between the hours of 4:30 p.m. and 5:30 p.m. (evening peak hour), except as otherwise approved by the County On-site Environmental Coordinator.

Air Quality

13. **Prior to issuance of construction permit**, the applicant, in coordination with the APCD, shall update the APCD-approved Emission Reduction Plan to include the following additional mitigation measures:

    a. Development of a comprehensive construction activity management plan designed to minimize, as feasible, the amount of large construction equipment operating during any given time period;

    b. Scheduling of construction truck trips, as feasible, during non-peak hours to reduce peak hour emissions;

    c. Limiting the length of the construction work-day period, if necessary and feasible, during periods with high air pollutant levels;

    d. Phasing of construction activities, if appropriate and feasible.

    e. Use of direct injection (ID) diesel engines (or equivalent) together with proper maintenance and operation to reduce emissions of NOx;

    f. Electrify equipment where feasible;

    g. Maintain all fossil-fuelled equipment in tune per manufacturer's specifications, except as otherwise required above;

    h. Encourage use of catalytic converters on gasoline-powered equipment;

    i. Substitute gasoline-powered for diesel-powered equipment, where feasible;

    j. Use compressed natural gas (CNG) or propane-powered portable equipment (e.g., compressors, generators, etc.) onsite instead of diesel-powered equipment, where feasible;

    k. All off-road and portable diesel-powered equipment, including but not limited to bulldozers, graders, cranes, loaders, scrapers, backhoes, generator sets, compressors, auxiliary power units, shall be fuelled exclusively with CARB-certified motor vehicle diesel fuel. Off-road equipment may use tax-exempt motor vehicle fuel if not operated on public roads;

l. Maximize, to the extent feasible, the use of diesel construction equipment meeting the CARB's 1996 or newer certification standard for off-road heavy-duty diesel engines;

m. All on and off-road diesel equipment shall not be allowed to idle for more than 5 minutes. Signs shall be posted in the designated areas to remind drivers of the 5-minute idling limit; and,

n. Portable equipment with engines greater than 50 horsepower used during the activities covered under the Final SEIR may require California statewide portable equipment registration (issued by the CARB) or an APCD permit. Operational sources, such as back up generators, may also require APCD permits. To minimize potential delays, prior to start of the project, the Applicant shall contact the APCD representative for specific information regarding permitting requirements of these types of equipment.

14. **Prior to issuance of construction permit**, the applicant shall fund an APCD managed air-emission-reduction program (AER Program) designed to achieve timely, real, quantifiable criteria and diesel PM reductions to offset project emissions. The Final SEIR estimates that the project's NOx emissions will be 90 tons. This estimate shall be refined by the applicant using actual vehicle fleet information as well as the scheduling that will be used for the proposed project. The refined estimate shall be submitted to the APCD for review and approval. The approved refined NOx emission estimate shall be used by APCD to set the necessary funding amount for the AER Program. Payment shall be submitted to the APCD in 4 quarterly payments, with the first payment commencing after the refined emission estimate is approved and the total funding amount is finalized.

15. **During construction activities**, the applicant, in coordination with the County of San Luis Obispo Air Pollution Control District (APCD), shall update the APCD-approved Dust Control Plan to include additional mitigation measures if determined necessary by the County On-site Environmental Coordinator (OEC) that include the following:

a. If use of dry decontamination methods to remove impacted material from the exteriors of trucks used to haul NHIS offsite is not sufficiently removing the impacted material such that it is being tracked outside the loading area, install wheel washers where vehicles enter and exit public streets, or wash off trucks and equipment leaving the site; and,

b. Sweep streets at the end of each day if visible soil material is carried by or spilled from the trucks hauling NHIS off the project site and deposited onto public roads. Water sweepers with reclaimed water should be used where feasible.

Agricultural Resources

16. **Prior to issuance of construction permit**, the applicant shall delineate a "driveway" through the truck staging area, connecting Thornberry Road to the farm equipment staging area using construction stakes or other means. This driveway shall be at least 20 feet in width to allow for two-way traffic to and from the farm equipment staging area. Haul trucks shall be prohibited from blocking this driveway at all times.

17. **During construction activities that result in more than 100 haul truck round-trips per day**, the applicant shall provide advanced notification (i.e., 1 week) to farmers adjacent to the Thornberry Road staging area.

18. **During construction**, the applicant shall stockpile topsoil, generated through grading necessary to temporarily locate the farm equipment staging area along Thornberry Road, in a manner that will preserve the soil for later replacement.

19. **Upon completion of all NHIS hauling activities**, the applicant shall return the farm equipment staging area to its original location along Thornberry Road. Any temporary improvements made in the relocated farm equipment staging area shall be removed and any topsoil replaced.

Public Safety

20. **During construction**, the applicant shall implement a review system for truck carriers contracted to haul NHIS offsite to ensure that only those with the safest records can carry loads. The review system would include the following:

    a. A review of CHP Mister reports;

    b. Ensuring correct Class licensing;

    c. Enrollment in a controlled substance and alcohol abuse program;

    d. Completion of Motor Carrier Safety Review type safety questionnaire; and,

    e. Assessment of Bureau of Motor Carrier Safety Ratings.

21. **During construction**, the applicant shall ensure that trucking companies contracted to haul NHIS offsite have programs in place to ensure that drivers maintain appropriate speeds. This would include the following:

    a. 55-mph maximum or applicable speed limit policy; and,

    b. Training on speeding and speed limits along the proposed route and/or speed control systems or governors in-place on trucks.

22. **During construction**, the applicant shall ensure that contracts made with trucking companies to haul NHIS offsite address safety reviews, speeding and violations, and unacceptable incentive practices, such as increased pay for increased numbers of loads that may be an incentive for drivers to act in an unsafe manner.

On-going conditions of approval (valid for the life of the project)

23. This land use permit is valid for a period of 24 months from its effective date unless time extensions are granted pursuant to Land Use Ordinance Section 23.02.050 or the land use permit is considered vested. This land use permit is considered to be vested once a construction permit has been issued and substantial site work has been completed. Substantial site work is defined by Land Use Ordinance Section 23.02.042 as site work progressed beyond grading and completion of structural foundations; and construction is occurring above grade.

24. All conditions of this approval shall be strictly adhered to, within the time frames specified, and in an on-going manner for the life of the project. Failure to comply with these conditions of approval may result in an immediate enforcement action by the Department of Planning and Building. If it is determined that violation(s) of these conditions of approval have occurred, or are occurring, this approval may be revoked pursuant to Section 23.10.160 of the Land Use Ordinance.

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EXHIBIT C – CEQA FINDINGS

Table of Contents

COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING AND BUILDING

CERTIFICATION OF A FINAL SUPLIMENTAL ENVIRONMENTAL IMPACT REPORT
FINDINGS OF MITIGATION AND
ADOPTION OF MITIGATION MONITORING PROGRAM FOR THE
GUADALUPE RESTORATION PROJECT

I. Environmental Determination

The Planning Commission of San Luis Obispo (SLO) County considered and relied on the Final Supplemental Environmental Impact Report (SEIR) (State Clearinghouse Number 1996051053) for the Guadalupe Restoration Project to certify the project on July 28, 2005. The Final SEIR consists of the Draft SEIR, the responses to comments on the Draft SEIR, a list of persons and agencies commenting on the Draft SEIR, the Mitigation Monitoring Program, (collectively referred to as the Final SEIR), and findings that it has been completed in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000, et seq.), and that the Planning Commission has received, reviewed, considered, and relied on the information contained in the Final SEIR, all hearings and submissions of testimony from officials, participating agencies, the public and other agencies and organizations. The Commission further finds that the Final SEIR reflects the Lead Agency's independent judgment and analyses.

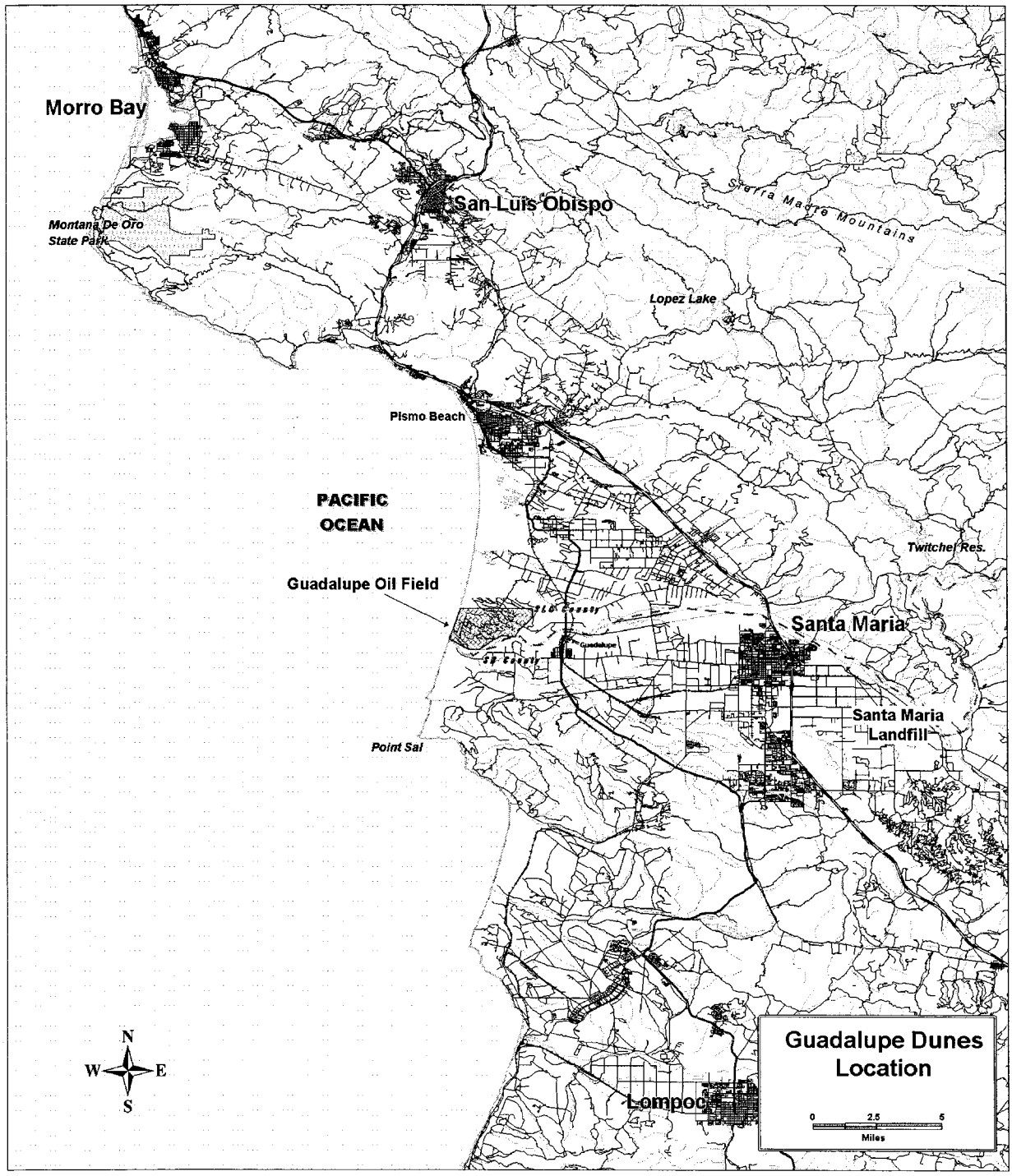
Having received, reviewed and considered the foregoing information, as well as any and all information in the record, the Planning Commission hereby makes these Findings of Fact pursuant to, and in accordance with, Section 21081 of the Public Resources Code, as follows:

II. Project Background

The Final Supplemental Environmental Impact Report (SEIR) is a supplement to the 1998 Guadalupe Oil Field Remediation and Abandonment Environmental Impact Report (Original EIR), prepared for San Luis Obispo (SLO) County. The SEIR was prepared to address the environmental impacts associated with Unocal's proposal to transport up to 860,000 cubic yards (cy) of Non-Hazardous Impacted Soils (NHIS) from the Guadalupe Oil Field (Guadalupe Field) to the City of Santa Maria Landfill (Landfill). The material would be used at the Landfill as cover for closing landfill cells.

The Guadalupe Field occupies over 2,700 acres of the larger Nipomo Dunes Complex and is located on the Central California Coast in San Luis Obispo and Santa Barbara Counties, as shown in Figure 1.

Figure 1 Proposed Project Location



The principal land use at the Guadalupe Field, from 1946 to March 1994, was the production of oil and natural gas. In the 1950s, a petroleum hydrocarbon referred to as diluent was introduced at the Guadalupe Field to assist in the production of the heavy crude oil. Diluent use ceased in 1990. Over the years, diluent was inadvertently released from the pipelines and storage tanks, and diluent sources are now present in soils and diluent plumes are present in ground water at the Guadalupe Field. Assessment activities to characterize and delineate the underground hydrocarbons and pilot studies to test the effectiveness of various remediation methods have been conducted at the Guadalupe Field.

In December 1998, SLO County certified the Original EIR (ADL 1998) that evaluated the impacts and determined mitigation measures for remedial actions, including excavation of diluent sources and treatment methods for the excavated material.

Several treatment methods were evaluated in the Original EIR, including the use of a Thermal Desorption Unit (TDU) and a Land Treatment Unit (LTU).

The Regional Water Quality Control Board (RWQCB) issued Cleanup and Abatement Order (CAO) 98-38, mandating remediation actions such as the excavation of specified sources and sumps. SLO County issued CDP/DP D890558D, which covered remediation and abandonment activities at the Guadalupe Field. This CDP/DP authorized Unocal to conduct remediation and site characterization activities at the Guadalupe oil field consistent with the RWQCB CAO 98-38 adopted by the RWQCB on April 3, 1998 and as amended on July 13, 1998 and November 6, 1998 (CDP/DP D890558D Condition F.1).

Since certification of the Original EIR, Unocal has had to make a number of minor modifications to the Restoration Project with the concurrence of the County Onsite Environmental Coordinator (OEC), SLO County, and the resource agencies as a result of increased information about various restoration sites. This is not unexpected given the complex nature of the Restoration Project. In fact, SLO County recognized this fact in developing the permit conditions for CDP/DP D890558D. Condition F.34 of SLO CDP/DP D890558D requires that Unocal conduct additional assessments at each of the CAO excavation sites and prepare final drawings prior to excavation. These final excavation drawings must be submitted to SLO County for review and approval. If the final areas to be excavated are larger than the initial excavation drawings, then SLO County, pursuant to Condition F.20 of CDP/DP D890558D, must determine if the changes are substantial enough to require additional environmental review and coastal land use permitting.

In order to comply with CDP/DP D890558D Condition F.34 and F.20 SLO County has been preparing substantial conformity reviews for all of the excavations at the Guadalupe site based upon the final excavation drawings developed by Unocal to determine if additional environmental review and permitting is required. The County has also been using these conditions to require substantial conformity reviews for other project elements where there have been minor modifications, such as the steam pilot test program, use of Q4 sand for backfill, etc. To date, many substantial conformity reviews and a number of CEQA addendums have been prepared to address minor modifications that Unocal has requested to the Guadalupe Restoration Project.

A substantial conformity review evaluates the minor project modifications to determine if the impacts and mitigation measures associated with the minor project modifications are adequately addressed in the existing environmental review documents and permit. If it is found that the minor modifications are adequately addressed in the existing environmental review documents and permit, then the modification is considered to be in substantial conformity, and no further environmental review or permitting is required. However, if new or substantially greater impacts

would be caused by the minor modification, then it would not be in substantial conformity, and additional environmental review, and possibly permitting, is required.

To date, the County has determined that various project modifications, such as sump excavations and modified plume configurations, were in substantial conformance with the original project. However, for this proposed change in the method of treatment/disposal of the NHIS, SLO County determined that an SEIR would be required since disposal of the NHIS at the Landfill was not evaluated in the Original EIR, and not covered in CDP/DP D890558D. In the Original EIR Unocal's proposed project was that the excavated material would be treated in LTU and then reused as backfill in subsequent excavation. The permits that were issued for the project were based upon the use of the LTU for treating the excavated material. Unocal conducted LTU pilot studies and began to process permit applications for the construction and operation of a LTU. In 2000, Unocal submitted an application to the RWQCB for Report of Waste Discharge Requirements (ROWD) and a Project Description to the County for a substantial conformity review. The processing of these LTU applications/reviews generated numerous agency questions, highlighting the need for additional information.

Screening-level bioassays of leachate from LTU-treated material indicated that there may be some level of intermediary toxicity that could be transferred to water in contact with the treated soil. Because the reuse of treated material as backfill for excavations would involve placement in saturated conditions adjacent to wetland areas, Unocal elected to pursue other treatment/disposal methods rather than undertake the additional studies that would be needed to determine the source and longevity of the potential toxicity from treated soil in saturated conditions.

The excavation of plumes and sumps at the Guadalupe Field pursuant to emergency orders and CAO 98-38 has been ongoing. As an interim measure while the LTU was undergoing development and permitting, plumes and sumps were excavated, the material stockpiled onsite, and sand from the Q12 and Q4 active dunes was used for backfill.

Without a permitted treatment/disposal method for the material excavated to date, the feasibility of reusing LTU-treated material for backfill uncertain, and the numerous factors (e.g., treatment standards, feasibility, agency concerns) that are still unknown for the potential treatment/disposal methods, Unocal and the agencies collectively agreed that the excavations should be suspended until a treatment/disposal method could be determined, permitted, and implemented.

Unocal undertook a number of studies that evaluated a range of treatment/disposal options. Based upon these studies, Unocal identified its preferred treatment/disposal option as being transport of the NHIS to the Landfill for use in their NHIS Program.
Unocal and the agencies also decided that the most expedient path to an acceptable treatment/disposal method would be to conduct environmental reviews for several feasible treatment and disposal methods as part of this SEIR. This SEIR evaluates the proposed project, trucking the material to the City of Santa Maria Landfill, and evaluates other selected disposal alternatives to a permit level of detail.

In accordance with California Code of Regulations (CCR) Title 27, which contains provisions to use NHIS to construct foundation layers for landfill closure, the RWQCB issued Revised Waste Discharge Requirements (WDR) Order No. 01-041 on May 18, 2001 to the Santa Maria Landfill. WDR 01-041 provides guidelines for the acceptance of NHIS from the restoration and cleanup of oil-producing sites. These plans were addressed in a Joint Technical Document (JTD) prepared by CH_2MHill and evaluated in the CEQA addendum to the 1993 Landfill EIR (SCH 92031045) and in subsequent EIRs (SML February and May, 2004).

According to the JTD and the SEIR, accepting impacted soils is consistent with the Landfill's intent to implement an expedited closure process at the landfill by using the NHIS: (1) to achieve design grades and serve as the foundation layer of the final cover system for the existing active portion of the landfill, and (2) for daily and intermediate cover material in the lined expansion areas of the landfill. The EIR Addendum identified no significant impacts associated with the use of NHIS.

It is important to note that the Landfill currently has a need for enough soils to close their remaining active cells. This need is estimated to be close to 5 million cy, well in excess of the amount located at the Guadalupe Field. Currently, the Landfill has been accepting NHIS from other sump locations in the Santa Maria Valley. However, these sources are winding down and the Landfill needs to locate other sources of materials for closure. The sources of material for closure will need to be found and materials transported to the Landfill regardless of the disposal decisions associated with this document.

The Landfill began accepting NHIS in early 2003. As discussed in the JTD, specific screening of the impacted soils is performed by the Landfill to determine its conformance to the RWQCB's acceptance criteria for each source of material entering the site. Only NHIS meeting the acceptance criteria are accepted for disposal in the landfill. Testing conducted as part of the Landfill EIR indicated that the Guadalupe material would qualify as NHIS. Analytical tests from well over 1,000 samples of material from the Guadalupe Field were compared against the Landfill's specifications for NHIS, and all of the samples met the specifications. As such, in evaluating the impacts of the proposed trucking project, all materials at the Field were assumed to meet the Landfill's specifications for NHIS. As part of the proposed project, testing of the NHIS will be done at both the Guadalupe Field and the Landfill. Any material that does not meet the NHIS specifications will be returned to the Guadalupe Field stockpile for additional natural attenuation.

III. Summary Project Description

Unocal is proposing to transport via truck up to 860,000 cubic yards of NHIS from the Guadalupe Field to the Santa Maria Landfill. The material would be used at the landfill as cover for closing landfill cells. Figure 2 shows the study area for the project, and the location of the Guadalupe Field and the Landfill.

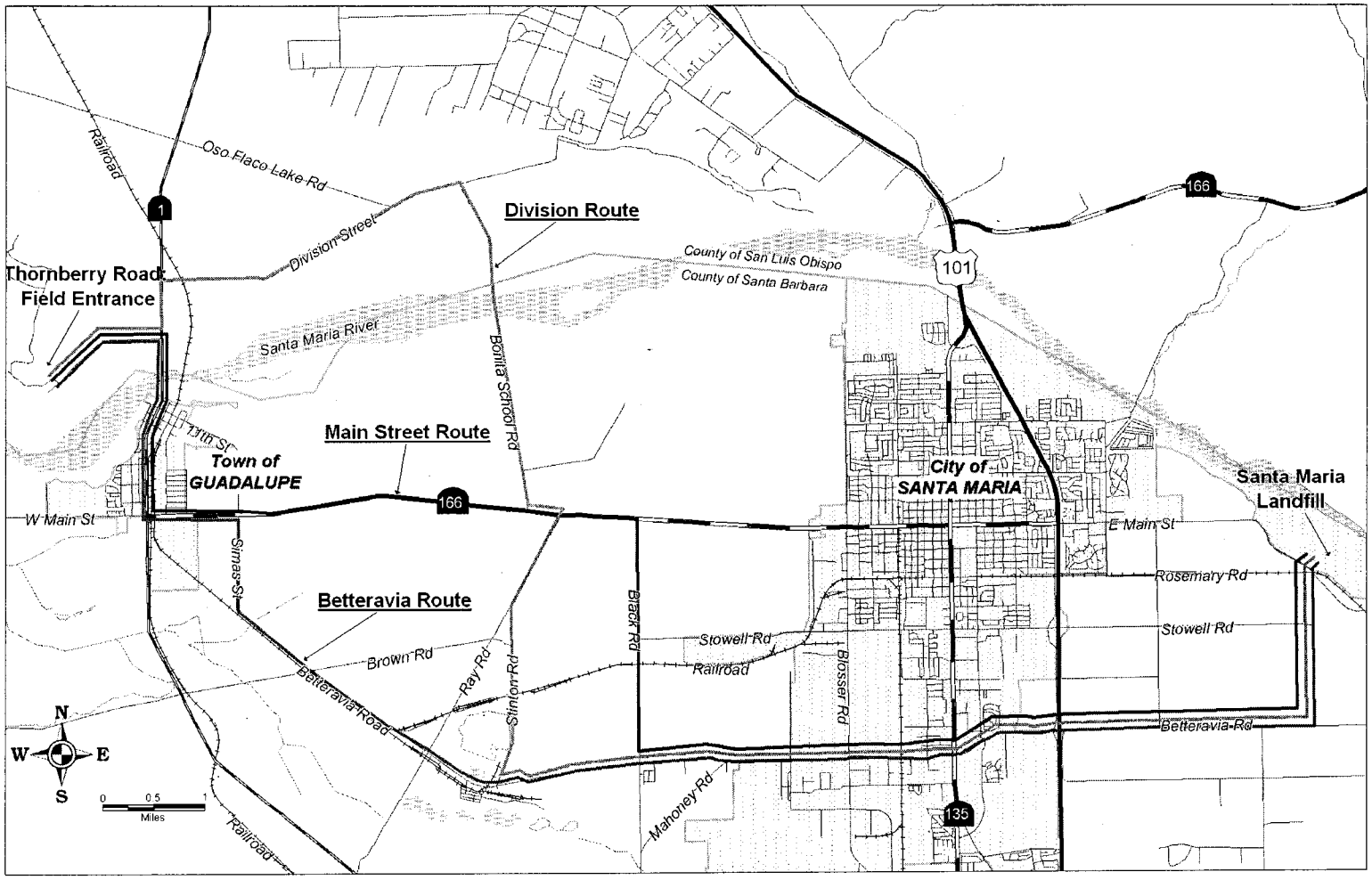
In a letter dated August 31, 2004, the Regional Water Quality Control Board (RWQCB) approved the acceptance of the Guadalupe NHIS as part of the Landfill's NHIS Program. Testing conducted as part of the Landfill's SEIR indicated that the Guadalupe material would qualify under the Landfill's NHIS program. Representative sampling of the Guadalupe material was conducted and the analytical results compared against the Landfill's acceptance criteria for NHIS, and all of the samples met the specifications. Also, historical analytical tests from over 1,000 samples of material from the Guadalupe Field were qualitatively compared by the Landfill and the RWQCB to the representative sampling results. As such, in evaluating the impacts of the proposed trucking project, all materials at the Field were assumed to meet the Landfill's specifications for NHIS. As part of the proposed project, additional testing of the NHIS will be done at both the Guadalupe Field and the Landfill. Any material that does not meet the NHIS specifications will be separated and handled appropriately.

For the proposed project of offsite trucking to the Landfill, trucks would be brought onsite and loaded with NHIS material. These trucks would then travel to the Landfill, a permitted, offsite, solid-waste-handling facility located in the Santa Maria city limits, where the NHIS would be offloaded. An estimated 860,000 cy of affected material would be hauled offsite. It is anticipated

that approximately 22,000 cy of red rock/road base material, which is considered part of the NHIS, would also be removed and trucked to the Landfill. Aggregate from screening activities may be generated onsite during excavation and treatment/disposal activities. The overburden from an excavation site may be screened to remove rocks and/or asphalt chunks before it is reused. Land treatment, if implemented, may require removal of large particles from the material before it can be processed. Aggregate from screening activities would also require transportation offsite. It is estimated that an additional 10,000 cy of aggregate could be removed from the site if screening is conducted.

The material taken to the Landfill would be used to expedite the closure process at the Landfill by using the NHIS to achieve design grades and serve as the foundation layer of the final cover system for the landfill cells that would be closed. The SEIR provides a description of the Landfill operations that would be associated with the handling of the NHIS from the Guadalupe Field. The environmental impacts associated with the placement of the Guadalupe material at the Landfill were addressed in a Supplemental EIR prepared by the City of Santa Maria (May 2004). This SEIR provides a summary of the environmental impacts identified in the City of Santa Maria's Supplemental EIR, which addressed the use of NHIS material from the Guadalupe Field.

Figure 2-5 Proposed Truck Routes to the Santa Maria Landfill



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IV. The Record

The California Code of Regulations, Title 14, Section 15091 (b), requires that the Planning Commissions' findings be supported by substantial evidence in the record. Accordingly, the Lead Agency's record consists of the following, which are located at the County Planning and Building Department Offices, San Luis Obispo, California:

- Documentary and oral evidence, testimony, and staff comments and responses received and reviewed by the Lead Agency during informational workshops, public review, and the public hearings on the project.

- The Guadalupe Restoration Project Final Supplemental Environmental Impact Report, as certified on July 28, 2005.

- Arthur D. Little, Inc. (ADL). 1998. Environmental Impact Report (EIR) for the Guadalupe Oil Field Remediation and Abandonment Project. Prepared for San Luis Obispo County.

- City of Santa Maria. 2004a. Final Supplemental EIR Santa Maria Regional Landfill Site Facility Permit. February.

- City of Santa Maria. 2004b. Final Second Supplemental EIR Santa Maria Regional Landfill Site Facility Permit. May.

- Komex-H20. 1997. Transmittal of Seismic Lines Profile, Guadalupe Oil Field, San Luis Obispo, California. Personal Communication from Robert Traylor of Komex-H20 to John Nall of San Luis Obispo County. June 25.

- LFR Levine-Fricke (LFR). 2003. Corrective Action Plan Options for Hydrocarbon-Affected Soils at the A6/TB2, B5A North, C7 North, C7 Southeast, and P13 Areas of the Former Guadalupe Oil Field, San Luis Obispo County, California. 002-06607-04-011. 30 July.

- Arthur D. Little, Inc. (ADL). 1996. Evaluation of Existing Data and Supplementary Investigation of Contamination at the Guadalupe Dunes Oil Field. Final Report. January.

- LFR Levine-Fricke (LFR). 1999. Background Metals Report, Guadalupe Oil Field, San Luis Obispo County, California. Version 2.1. Ratified December 16.

- LFR Levine-Fricke (LFR). 2001a. Historical Mercury Use at the Former Guadalupe Oil Field. Version 2.0. Ratified July 27.

- Moffit & Nichols Engineers. 2001. Summary Report for Santa Maria River Enhancement Project. Progress report prepared for SAIC.

- Regional Water Quality Control Board (RWQCB). 1994. Basin Plan.

- California Department of Transportation (CalTrans). 2003. Traffic Volumes on the California State Highway System. Published on the Internet: http://www.dot.ca.gov/hq/traffops/saferesr/trafdata/2003all.htm.

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- Levine-Fricke (LFR). 2003. 2003 Habitat Inventory and Ecological Database for the Guadalupe Restoration Project San Luis Obispo County, California. Prepared for Unocal Corporation. November.
- Levine-Fricke (LFR). 2004. Quarterly Ecological Monitoring Report, 1st Quarter 2004. Guadalupe Oil Field, San Luis Obispo County, California. May.
- Unocal. 2002. Habitat Restoration, Revegetation and Monitoring Plan (HRRMP). April (revised).
- Unocal. 2003. Site-Wide Exotic Species Management and Eradication Program (SWEEP). Prepared by Jordan Environmental Services, JEN Ecological Services, and All Seasons Weed Control. April.
- Unocal. 2004. Results of 2004 Surveys for La Graciosa thistle, Surf thistle, and beach spectacle-pod. Unpublished.
- ENSR. 2004a. Guadalupe Restoration Project, Draft Emission Estimates for Disposal and Reuse of Affected Materials. Prepared for Union Oil Company of California. Document Number 06940-522-100. June 2004.
- ENSR. 2004b. Guadalupe Restoration Project, Diesel Exhaust Particulate Matter Health Risk Assessment for Off-Site Trucking. Prepared for Union Oil Company of California. Document Number 06940-522-400. December 2004.
- Levine-Fricke (LFR). 2002. Geologic Evaluation for Serpentine or Ultramafic Rock. Guadalupe Restoration Project. November 6, 2002.
- San Luis Obispo County APCD. 1999. Rule 219 – Toxics New Source Review. March 24, 1999.
- San Luis Obispo County APCD. 2000. Emission Inventory, available at: http://www.slocleanair.org/air/emissions.asp. As viewed in June 2004.
- San Luis Obispo County APCD. 2001. Clean Air Plan.
- San Luis Obispo County APCD. 2003. CEQA Air Quality Handbook.
- Santa Barbara County. 1995. Environmental Thresholds and Guidelines Manual. Planning and Development Department. January 1995.
- Matters of common knowledge to the Lead Agency which it considers, such as:

1. SLO County General Plan, including the land use maps and elements thereof.

2. The text of the Land Use Element.

3. CEQA and the State CEQA guidelines implementing the act.

4. SLO County Environmental Quality Act Guidelines.

5. Other formally adopted policies and ordinances of SLO County.

V. Certification of the June 2005 Final Supplemental Environmental Impact Report for the Guadalupe Restoration Project

The SLO County Planning Commission makes the following findings with respect to the June 2005 Final Supplemental Environmental Impact Report for the Guadalupe Restoration Project SCH #1996051053:

A. The Planning Commission has reviewed and considered the documents and other information listed in Section IV above.

B. The June 2005 Final Environmental Supplemental Impact Report for the Guadalupe Restoration Project has been completed in compliance with the California Environmental Quality Act.

C. The Planning Commission has considered the information contained in the June 2005 Final SEIR for the Guadalupe Restoration Project, the public comments and responses previously submitted, and the public comments and information presented at the public hearings.

D. All information was considered by the Planning Commission before taking an action on the project.

E. The Planning Commission hereby finds and determines that implementation of the Guadalupe Restoration Project may have a significant adverse effect on the environment.

F. The Planning Commission hereby finds with respect to the adverse environmental impacts detailed in the Final SEIR:

   1. That, based on information set forth in the Final SEIR, the Findings of Fact, the list of mitigation measures included in the Summary of Mitigation Measures (Section 8.0 of the Final SEIR), the Planning Commission finds and determines that changes or alterations have been required in or incorporated into the project which avoid or substantially lessen the adverse environmental effects identified in the Final SEIR for all issue areas.

   2. That no additional adverse impacts will have a significant effect or result in substantial or potentially substantial adverse changes in the environment as a result of the Guadalupe Remediation Project.

G. The Planning Commission hereby finds and determines that:

1. All significant effects that can be feasibly avoided have been eliminated or substantially lessened as determined through the findings and supporting evidence set forth in Section VIII.

2. Based on the Final SEIR and the Findings of Fact and other documents in the record, specific environmental, economic, social, legal and other considerations make infeasible other project alternatives identified in the Final SEIR.

3. Should the final design of the Guadalupe Restoration Project have the potential to result in adverse environmental impacts that are not anticipated or addressed by the June 2005 Final SEIR, subsequent environmental review shall be required in accordance with CEQA Guidelines Section 15162(a).

VI. Statement of Overriding Consideration

The Final EIR has identified and discussed significant effects that will occur as a result of the proposed project. With the implementation of the mitigation measures identified in the Final SEIR, these effects can be mitigated to a level of insignificance. Therefore, no statement of Overriding Consideration is required.

IMPACT ANALYSIS: Four categories of impacts are identified:

Class I. Class I impacts are significant and unavoidable. To approve a project resulting in Class I impacts, the CEQA Guidelines require decision makers to make findings and a statement of overriding considerations that discusses as applicable the economic, legal, social, technical and other benefits of the proposed project against the unavoidable environmental risks. The Guadalupe Restoration Project has not resulted in any Class I impacts.

Class II. Class II impacts are significant but can be mitigated to a level of insignificance by measures identified in the June 2005 Final SEIR and the project description. When approving a project with Class II impacts, the decision-makers must make findings that;

1. Changes or alternatives to the project have been incorporated that reduce the impacts to a less than significant level, or

2. That such changes or alternatives are within the responsibility and jurisdiction of another governmental agency and not the Lead Agency making the finding, and that such other governmental agency can and should adopt the required project changes or alternatives.

Class III. Class III impacts are adverse but not significant.

Class IV. Beneficial impacts.

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VII. Potential Environmental Effects Which Are Beneficial or Not Significant

The Planning Commission has concluded that the following effects are not considered significant.

Surficial Geology and Coastal Geomorphology	
Impact GEO.1	Removal of the TB8 Stockpile would increase exposure to unstable earth conditions, such as landslides or similar hazards, as a result of seismic activity (FSEIR page 5-11).
Mitigation	None additional. This limited increase in exposure to earthquakes would exist only during removal of NHIS and would not result in a permanent or long-term exposure. In addition, the TB8 Stockpile is currently covered with Soil Sement® (an insoluble, non-toxic, polymer emulsion used to suppress dust generation), which prevents erosion and would increase slope stability in the unlikely event of an earthquake during project operations.
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: Although shallow ground water is locally present, geotechnical studies indicate that soils beneath the Guadalupe Field are generally not subject to liquefaction. The current use of Soil Sement® would serve to increase slope stability in the unlikely event of an earthquake during the limited time period (2-4 years) that the TB8 Stockpile would be removed.	
Impact GEO.2	Road-widening activities would increase the potential for a loss of topsoil (FSEIR page 5-12).
Mitigation	None additional. CDP/DP D890558D Condition F64.c requires Unocal to salvage for reuse all topsoil where soil and/or vegetation are to be removed.
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: Salvage and reuse of topsoil would serve to prevent any loss.	
Impact GEO.3	The excavation of sand at Q4 may modify erosion/sedimentation patterns as a result of wind scour, contour changes, and loss of vegetation (FSEIR page 5-13).
Mitigation	**GEO-3.1** Edges of the excavation boundary at Q4 should be set back at least 8 meters (26 ft) from the present boundary of established vegetation on adjacent undisturbed slopes prior to removal of sand from Q4.
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: As required by CDP/DP D890558D Condition F11.c, Unocal prepared a geomorphological report (Sherman 1998) for removal of up to 1,000,000 cy from Q4. Previous environmental reviews, conducted by the San Luis Obispo County have addressed the removal of 500,000 cubic yards (cy) of clean sand from Q4 to use as backfill in the excavations. Based upon these reviews, San Luis Obispo County has approved the use of up to 500,000 cy of sand from Q4 for use as backfill in excavations. This impact discussion addresses the use of up to 1,000,000 cy of sand from Q4 for backfill in excavations. Conventional excavation methods are proposed at the Q4 Area. A level area at the 75 foot elevation will be maintained into the excavation area, where up to 75 vertical feet of sand will be removed at the easternmost end. Per the Sherman (1998) report, the alteration of dune morphology associated with a sand excavation project poses two main types of risk for a negative environmental impact. First, there is	

Surficial Geology and Coastal Geomorphology	
the risk of destabilizing an otherwise relict feature, and initiating blowouts and a new period of dune migration. The proposed Q4 borrow location is an existing blowout, and the dune is already active. As long as the vegetation edging the open sand areas is not disturbed by this operation, there is minimal risk of this impact resulting.	
Impact GEO.4	Excavation activities at Q4 could trigger shallow slides or infinite slope failures (FSEIR page 5-14).
Mitigation	**GEO-4.1** Position of the angular boundary at the top of the excavated dune area shall be monitored weekly at Q4 in areas adjacent to the vegetation line while excavation of the Q4 area is actively occurring, so that GEO-3.1 is not violated.
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: The proposed project includes activities which have the potential to trigger superficial landslides along the face of steep dunes. In particular, any activities on the face or at the toe of a dune slope steeper than 25 degrees may lead to propagation of a shallow failure as far as the top of the dune. Although a shallow slide would not significantly change the contours of the dune surface, the shifting of the sand can uproot and bury established vegetation, alter established habitats, or bury wetland areas at the base of the dune. Deep slope failure could result from unsupported excavation on the face or at the toe of a dune slope steeper than 25 degrees. Loading on or near the crest of an existing slope could also induce deep slope failure. A deep slide would significantly change the contours of the dune surface. Excavation proposed at the Q4 Area will result in 2:1 side slopes (22.5 degrees) along the perimeter, but steeper slopes may occur during the excavation process and pose a safety concern. Since slope adjustments will occur from the top of the dune down, the limit of excavation at the bottom must be controlled in such a manner that the top does not migrate outward into vegetated areas.	

Surface and Ground Water Quality	
Impact W.4	Inadvertent spills of petroleum products from trucks or fueling structures could release hydrocarbons to the project site, causing recontamination of a previously remediated site or introduce contamination to an uncontaminated site (FSEIR page 5-33)..
Mitigation	None.
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: Indirect effects on water resources from the project could result from accidental spills into or near open water of petroleum products, such as diesel fuel and hydraulic fluids, required for operation of motorized equipment. Although unlikely, large oil spill volumes could degrade water quality, with the potential for toxicity and contaminant bioaccumulation in aquatic organisms, and/or leaching into the aquifer. Preparation and implementation of an approved Spill Contingency Plan is required by CDP/DP D890558D Condition F38. Spill containment and cleanup protocols, such as storage requirements and notification procedures, are also specified in spill response portions of the operation plan prepared and implemented by the trucking contractor.	

Biological Resources	
Impact BIO.2	Road-widening activities in the Guadalupe Field could result in disturbance and mortality to wildlife (FSEIR page 5-59).
Mitigation	None.
Findings	Impacts are considered *adverse but not significant* (Class III).

Supportive Evidence: Road widening, occurring in the backdune habitat would result in the potential loss of individuals of common wildlife species and species of Federal or State concern. Impacts associated with ground disturbances, vegetation removal, noise, and increased human presence (during road-widening and paving activities) could include mortality to some less-mobile species (reptiles and rodents) inhabiting the zone of disturbance and frightening of wildlife of both common and sensitive species from the area. Most wildlife species do not generally occur close to roads and are already exposed to impacts from traffic on the main roads of the Guadalupe Field.

However, several sensitive wildlife species having smaller home ranges are known to occur immediately adjacent to the road ways. Sensitive wildlife species occurring in the backdune habitat close to roads and potentially affected by activities include California horned lizard (CSC) and silvery legless lizard (CSC). Only a small portion of backdune area is expected to be affected by road-widening activities and represents less than one percent of the Guadalupe Field's total backdune habitat area.

CDP/DP D890558D Condition F64.b.iii requires Unocal to conduct wildlife surveys prior to any activity that would impact wildlife or wildlife habitat. The area of disturbance and surrounding habitat would be searched with appropriate methods (in upland habitat, biologists would visually search for animals using rakes to expose those animals underground, and a biologist would be present during initial disturbances to capture and remove any wildlife in danger). Captured animals would be relocated to the nearest available habitat away from the disturbance zone. CDP/DP D890558D Condition F68 requires Unocal to adjust or limit the area of disturbance as feasible to avoid impacts to individual or populations of sensitive species.

Impact BIO.4	Hauling of NHIS offsite has the potential to adversely affect biological resources outside the Guadalupe Field (FSEIR page 5-62).
Mitigation	None.
Findings	Impacts are considered *adverse but not significant* (Class III).

Supportive Evidence: The habitat adjacent to the proposed haul route to the Santa Maria Landfill off of the Guadalupe Field is predominantly agricultural fields and industrial or urban areas. These areas, in general, do not provide suitable habitat for most biological resources. However, portions of the haul route along Betteravia Road (predominantly between Black and Blosser roads) contain vernal pool and open grassland habitats, both of which support numerous plant and wildlife species and potentially support several species with special status (California tiger salamander, FT, and western spadefoot toad, CSC). The traffic impacts discussion (see Section 5.6 of the FSEIR) describes the current average daily traffic conditions (in a peak month) on this portion of the haul route as exceeding 10,000 truck trips (CalTrans 2003) and, therefore, the proposed increase of 300 round-trip truck trips on these routes are not reasonably expected to increase the potential for impacts to wildlife or plant species along any portions of the haul route.

Visual Resources	
Impact VR.1	Temporary and short-term, adverse visual impacts would result from the presence and operation of construction equipment for loading and transport of NHIS from TB8 (FSEIR page 5-83).
Mitigation	None.
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: Activities for the proposed project would be concentrated at the TB8 and the stockpiles located there and TB9. The critical view of TB8 is from the beach areas and the County Park. Figure 5.4-2 shows a viewshed analysis depicting the areas that can be seen from West Main Street and the County Park. Note that TB8 can be seen from the County Park, which is close to a mile from TB8. Views from points along West Main Street are generally limited to the dunes along the Santa Maria River because they are higher than areas inland. Equipment located at TB8 would include trucks and loaders, as well as possible screening equipment. The viewing distance is greater than 1,500 ft from the closest beach areas, and the construction equipment would appear small compared to the existing site features. While noticeable, the equipment and activity should be subordinate to other features in view, particularly the existing structures. Existing visual conditions are VMC 3 (distracting, visually co-dominant), having been adversely affected by TB8 structures; those features are co-dominant in the subject view. In addition, some equipment-related dust plumes may be generated that would be visible from the beach areas, along Main Street, or from the Point Sal Dunes subdivision. However, these impacts would be very short term in nature.	

Air Quality	
Impact AQ.1	The air emissions from project construction would exceed significance thresholds (FSEIR page 5-106).
Mitigation	*None.*
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: Summaries of the project emissions are presented in the Table 5.5.7 of the FSEIR (page 5-107). Conservative assumptions were used in developing these emissions. As the data in Table 5.5.7 shows, the construction emissions are below the significance thresholds. The ROC emissions were estimated to be 15 lbs per day and 0.05 tons per quarter, which is below the thresholds of 185 lbs per day and 2.5 tons per quarter. The NO_x emissions were estimated to be 99.2 lbs per day and 0.49 tons per quarter, which is below the thresholds of 185 lbs per day and 2.5 tons per quarter. The PM_{10} emissions were estimated to be 31.3 lbs per day and 0.12 tons per quarter, which is below the thresholds of 185 lbs per day and 2.5 tons per quarter.	
Impact AQ.3	Remedial activities could expose public sensitive receptors to emissions of toxic vapors, resulting in adverse health effects (FSEIR page 5-112).
Mitigation	None. Mitigation measures AQ-2.2 and AQ-2.3 for Impact AQ.2 would also serve to further reduce the PM_{10} emissions from diesel exhaust.
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: Modeling was done to determine if exposure to diesel exhaust from trucks hauling soil to the Santa Maria Landfill could pose health risks to the sensitive receptors along the hauling route due to the long nature of the project (two to four years). The complete	

Air Quality	
health risk assessment is contained in Appendix C of the FSEIR. Conservative, worst-case assumptions were made for the health risk modeling. The results of the health risk assessment are summarized in Table 5.5.11 of the FSEIR (page5-114). The results indicate that the cancer risks from the project (maximum is equal to 1.044 in a million for a child at Bonita Elementary School) are below the modified threshold of 10 in a million.	
Impact AQ.4	Soil-moving activities could cause human health impacts if the soils contain naturally occurring asbestos. (FSEIR page 5-115).
Mitigation	None.
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: Evaluation of impacts from encountering serpentinite and serpentine-rich soils during soil movement activities is required by the SLO APCD. Such asbestos-containing materials constitute a potentially significant impact to human health. SLO APCD Rule 412, Airborne Toxic Control Measures, incorporates the California Code of Regulations (CCR) Section 93105, *Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations* (CARB 2000). This is the regulation that mandates requirements in regard to soil-moving operations and encountering of naturally occurring asbestos, such as serpentine-rich or ultramafic rock. SLO APCD requires that impacts from natural asbestos presence have to be addressed in any proposed project that involves soil-moving operations, unless a geologic evaluation of the soils for these materials is performed with negative findings. Unocal retained Levine-Fricke (LFR) to evaluate potential occurrence of serpentine or ultramafic rock at the project site. The LFR evaluation concluded that no naturally occurring asbestos had been found in previous soil sampling and no surface exposures of serpentine or ultrafamic rock have been mapped at or adjacent to the project site. The nearest large exposure is approximately 5 miles to the south of the site. Other small exposures have been mapped approximately 7 miles to the north and approximately 12 miles to the east of the project site. Unocal requested the SLO APCD to grant an Exemption from the CCR Section 93105 for the soil-moving operations work at the Guadalupe Field based on the above-described geological evaluation; the exemption was granted. Asbestos-containing materials have not been encountered during past remediation activities, and the geological evaluation concluded that it is unlikely that naturally occurring asbestos will be encountered during future soil-moving operations.	

Transportation/Circulation		
Impact T.2	Use of local roadways by heavy trucks for offsite hauling of NHIS could cause physical damage to road surfaces (FSEIR page 5-146).	
Mitigation	**T-2.1**	The Applicant shall update the existing Traffic Control Plan (see CDP/DP Condition 93) that details specific truck trip vehicle routes to the Landfill, peak hour and route restrictions, road surface maintenance, and traffic safety. The updated Traffic Control Plan shall be approved by the San Luis Obispo County Department of Public Works in consultation with the Santa Barbara County Public Works Department, Roads/Traffic Division.
Findings	Impacts are considered *adverse but not significant* (Class III).	
Supportive Evidence: There is the potential for road surfaces in the project area to be		

damaged or altered from the project-related trucks over the course of the project. Although road wear is caused by excessive repetitive use, the proposed project would contribute only approximately 1% to 7% (depending on the road segment) to the current daily truck traffic on Betteravia Road during NHIS hauling to the Santa Maria Landfill (the number of truck trips per day are estimated to be 300 in the worst case for periods of peak activity). However, Thornberry Road and Highway 1 in the City of Guadalupe receive significantly less traffic and could experience road surface damage from repetitive project-related trucks. Thornberry Road is proposed to be repaired by the Applicant. CDP/DP Condition F94 is required to be implemented for this project, and will serve to mitigate any road damage.

The project-related trucks would add anywhere from below 2% to over 15% to the future (i.e., two to four years) traffic on the roadways under SB County jurisdiction (see Table below). Those roads that have higher percentage of traffic increase due to the project are rural roads operating at LOS A (Simas Rd., Bonita School Rd., Black Rd. Betteravia Rd. east of Simas Rd., Philbric Rd.). These roads currently experience high truck and farm equipment traffic.

The increase in traffic as a result of the project does not result in a significant impact based upon the San Luis Obispo County significance criteria.

Noise	
Impact N.1	The proposed project would expose sensitive receptors near the project site to increased noise levels (FSEIR page 5-167).
Mitigation	None.
Findings	Impacts are considered *adverse but not significant* (Class III).

Supportive Evidence: Operational phase noise would be generated by the heavy equipment moving and loading soil into the haul trucks and by the trucks along the haul route. Noise impacts associated with the proposed project will occur over 2 to 4 years, depending on the quantity of soil transported (200,000 cy or 860,000 cy) and size of the trucks (see Section 2.0, Project Description). Project noise levels at most impacted sensitive receptors near the project site are given in Table 5.7.8. Several sensitive receptors would be impacted both by noise from the onsite equipment and by additional noise generated by the haul trucks along the transportation route to the Landfill, due to the proximity of those receptors to the noise sources and a lack of noise barriers (e.g., other buildings, landscape) shielding them from noise. For those receptors (residence at the end of Thornberry Road, Kermit McKenzie School, and LeRoy County Park), noise estimates accounted for both noise sources (impacts from the haul trucks are discussed for Impact N-2, below).

Resulting noise levels at most of the sensitive receptors would be within the applicable thresholds. Noise increases were estimated to be less than 3 dBA for all but two sensitive receptors in the vicinity of the Guadalupe Field. All receptors except for the residence at the end of Thornberry Road are under the SBC noise criteria. The resulting CNEL for those receptors was estimated to be under the threshold of 65 dBA CNEL.

The residence at the end of Thornberry Road is under the SLO County jurisdiction. By the SLO County criteria, a project would result in the significant noise impacts if the project results in daily Leq over 50 dBA. If the baseline noise is already over Leq of 50 dBA for that receptor, then the project impacts would be significant if the day Leq increase exceeds 3 dBA. The baseline noise at the residence at the end of Thornberry Road is already above the significance criteria (Baseline Leq = 58.0 dBA). However, noise from the project will not result in a peak daily Leq increase over 3 dBA at this receptor.

Impact N.2	Transportation of affected soil offsite would expose sensitive receptors along

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Noise	
	the transportation route to increased noise levels (FSEIR page 5-169).
Mitigation	None.
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: At many sensitive receptors, current noise levels are already above the exterior noise significance threshold (a CNEL of 60 dBA (for the City of Santa Maria) or L_{eq} of 50 dBA (for SLO County), and would be increased with the project implementation. Under the worst-case scenario of 300 Average Daily Traffic (ADT) (one-way trips) or 38 peak-hour trips between the Guadalupe Field and the Santa Maria Landfill, noise levels along the proposed haul route would increase by less than 3 dBA., which is less than all of the significance criteria.	

Land Use and Recreation	
Impact LU.1	Proposed project activities could result in disturbances that diminish the quality of a particular land use, especially residential areas along the transportation corridors (FSEIR page 5-195).
Mitigation	None additional proposed. Mitigation measures provided in various issue areas would serve to reduce the severity of this impact.
Findings	Impacts are considered *adverse but not significant* (Class III).

Supportive Evidence: Impacts from the activities that could affect land use include the offsite movement of NHIS, air pollution and odors, traffic, and noise. The potential land use impacts associated with these factors are discussed below.

Air Quality – Air quality associated with the proposed project and recommended mitigation measures is analyzed in the Air Quality section. Air pollution would be generated by construction machinery, truck transportation, other motor vehicles, and earth-moving activities, among others. Decreased air quality could adversely affect land use if it would prevent or otherwise limit a planned or permitted use on a nearby property. Air quality impacts associated with truck transport would be expected to pose a disturbance that would diminish the quality of the recreational use of the area. Because the amount of agricultural activities in the area are substantial and involve a large number of trucks and associated truck diesel emissions, this impact would be considered less than significant.

Traffic – Traffic impacts associated with the proposed project and mitigation measures are analyzed in the Traffic section of this SEIR. Increased traffic could adversely affect land use if it would prevent or otherwise limit a planned or permitted use on a nearby property. While increased traffic may cause delays and inconvenience, it is not expected to preclude a permitted use or pose a disturbance that would diminish the quality of a particular land use.

Noise – Noise impacts associated with the proposed project and mitigation measures are analyzed in the Noise section. Offsite trucking activities would increase the ambient noise levels for the duration of the project along transportation corridors. Temporary noise impacts would primarily affect recreational and residential land uses and receptors. Noise could adversely affect land use if it would prevent or otherwise limit a planned or permitted use on a nearby property. However, because noise impacts would occur along existing traffic corridors and it is not expected that the project would substantially increase traffic noise along these corridors to an extent that would prevent or limit uses, noise impacts to land use are considered less than significant.

Cultural Resources	
Impact CR.1	Road widening, paving, and placement of road base material could result in substantial new ground disturbance, with possible disturbances to intact archaeological resources (FSEIR page 5-206).
Mitigation	*None.*
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: Approximately 8,600 linear feet of road widening, with an estimated ten-foot-wide disturbance corridor, (approximately 2.0 acres) could occur as part of the proposed project. Open sand along the Main Road could be impacted. At these sites, sand movement often encroaches on the road itself, and sand is periodically removed from the road to maintain access. Because the sands along the roadway do not represent the landform on which prehistoric populations would have lived, the likelihood for disturbing intact prehistoric resources during road widening is very low. Additionally, the depth of ground disturbance would be relatively shallow, estimated to be less than 12 inches. This shallow disturbance would also be unlikely to disturb intact prehistoric landforms.	
Impact CR.2	Use of the proposed haul routes for offsite trucking of the NHIS could increase impacts on cultural resources (FSEIR page 5-206).
Mitigation	*None.*
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: Increased truck traffic along proposed haul routes would not increase direct or indirect impacts on cultural resources within the vicinity. No ground disturbances would occur, and the increased traffic would not have the potential to elevate the potential access to prehistoric sites and associated illicit artifact collection.	

Agricultural Resources	
Impact AG.1	The offsite hauling of NHIS would increase truck trips on roads used to move and transport farm equipment and farm products, which would potentially limit access to agricultural areas and movement of agricultural crops and equipment and conflict with existing Santa Barbara County agricultural goals (FSEIR page 5-217).
Mitigation	None.
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: The proposed project would result in an additional 300 daily truck trips (150 round-trips) during peak peariods of work activity, between the Guadalupe Field and the Santa Maria Landfill over a 2- to 4-year period. There is important farmland along the proposed truck routes. An evaluation of traffic impacts (Section 5.6 of the FSEIR) found that these truck trips would not have an effect on Level of Service. Because there are no significant traffic impacts associated with theses haul routes, and because of the temporary nature of the hauling, it is assumed that the increase in truck traffic would not constitute a change in the existing environment which would lead to conversion of important farmland to non-agricultural use.	
Impact AG.3	The widening of Thornberry Road would result in a local, potentially long-term loss of 0.6 acres of Prime Farmland (FSEIR page 5-218).

Agricultural Resources		
Mitigation	**AG.3.1**	Any grading necessary to temporarily relocate the farm equipment staging area along Thornberry Road shall stock pile topsoil in a manner that will preserve the soil for later replacement.
	AG.3.2	At project conclusion the farm equipment staging area should be returned to its original location along Thornberry Road. Any temporary improvements made in the relocated farm equipment staging area should be removed and any topsoil replaced.
Findings	Impacts are considered *adverse but not significant* (Class III).	
Supportive Evidence: The proposed staging area along Thornberry Road is in an area designated as Prime Farmland. In total, the proposed staging area would occupy approximately 0.6 acres. The proposed staging area would be located in the shoulder area of the existing road, in an area used for assembling harvesting equipment and agricultural worker parking. Under a worst-case scenario, it is assumed that the existing assembly area would be relocated to an area currently under cultivation, removing 0.6 acres of crop area. Given the time to construct the staging area and the anticipated time of material hauling (2 to 4 years) this would be a temporary, short-term impact. If the required duration of the relocated assembly area extends to 5 years or more, the impact would be considered long-term. Once hauling is complete, the truck staging area created by the proposed project could be used again for assembling harvesting equipment and agricultural worker parking, and the 0.6 acres used temporarily for this purpose could go back into agricultural production.		

Public Safety	
Impact PS.1	Mechanical hazards associated with the loading and transportation of NHIS in areas with public access could pose a hazard to the public, regulatory agency personnel, and workers. (FSEIR page 5-230).
Mitigation	None.
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: The loading and transportation of NHIS would not be conducted in areas where the public has access. These areas, TB8 and TB9, would be accessible to workers only. Workers and regulatory agency personnel would be subjected to the hazards through the Guadalupe Field associated with construction equipment and loading operations. However, these hazards would occur in areas far removed from points of potential public access, thus restricting hazards to workers and regulatory agency personnel who will be frequently visiting the Guadalupe Field. These personnel typically are familiar with this type of occupational hazard.	
Impact PS.3	Spillage of fuel during fueling procedures, during transportation of fuel and of NHIS, or leaking fuel from heavy equipment could pose a hazard to workers and possibly the public (FSEIR page 5-232).
Mitigation	None.
Findings	Impacts are considered *adverse but not significant* (Class III).
Supportive Evidence: The proposed project involves the use of heavy equipment for loading operations at TB8 and TB9 and of trucks for hauling of affected material offsite. Fuels, primarily diesel fuel, would be used to operate the machinery. Fuel could be released during fueling or from leakage during operation. Fuel spills could result in a fire, which would be potentially	

Public Safety
significant if it occurs in close proximity to the public. Also, fuel would need to be transported to the Guadalupe Field via tanker trucks to refuel heavy equipment used for loading operations. Hazards would be associated with a fuel spill and subsequent fire. Because only diesel fuel will be transported, which would not produce flammable vapor clouds, these impacts would be limited to the immediate vicinity of the spill, and potential exposure would be minimal. Measures already in place (CDP/DP D890558D Condition F.38), addressing staging areas and fuel spill contingency plans, would be applied for the proposed project as well and would effectively reduce the impacts to less than significant.

VIII. Potential Significant Effects Which Have Been Mitigated to a Level of Insignificance

The Planning Commission has concluded that the mitigation measures identified in the Mitigation Monitoring Program (Section XII.) will result in substantial mitigation of the following effects and that these effects are not considered significant or they have been mitigated to a level of insignificance.

Surface and Ground Water Quality	
Impact W.1	NHIS spills from trucks on route to the offsite facility could release hydrocarbon-affected soils to surface waters or sensitive wetland habitats (FSEIR page 5-30).
Mitigation	**W-1.1** Require licensed professional drivers to operate trucks and adhere to the Traffic Control Plan (described in Condition F93). **W-1.2** Develop and implement response plans specifically for NHIS spills from trucks that include explicit emergency notification procedures. Identify a designated response team and maintain cleanup equipment onsite or near the truck route. Require drivers to complete spill response training program.
Findings	After implementation of the mitigation measures, the proposed project impacts would be *not significant with mitigation* (Class II).
Supportive Evidence: Trucking NHIS to the Santa Maria Landfill would not result in any deliberate waste discharges to surface or ground waters or ground water withdrawal. Releases of contaminated materials (i.e., soils) to surface waters would occur only as a result of accidental spills from a truck(s) or loading equipment that occur near surface waters (e.g., Santa Maria River, ditches draining agricultural fields, or seasonal ponds). Although unlikely, spills could degrade the water quality of the affected water body and/or cause localized changes in flow patterns. Potential impacts to ground water from spills are considered minimal because spills would be contained and cleaned up before significant leaching of any residual soluble contaminants would occur. The truck route from the Guadalupe Field to the Santa Maria Landfill involves a number of potential traffic hazards, including narrow roads with minimal or unpaved shoulders and slow-moving agricultural equipment. In particular, the truck route in the Guadalupe Field is narrow, with minimal shoulders and blind corners, and is subject to buildup of wind-blown migrating dune sand. These conditions could increase the risk of accidents and spills of NHIS onto the roadway or shoulder. Truck accidents have already occurred during the site remediation	

Surface and Ground Water Quality	
activities to date [County OEC Monitoring Report]. The potential for future truck spills is expected to increase with the greater numbers of truck trips required to transport soils to the Landfill. Impacts from spills to water resources depend on the size of the spill, conditions at the spill site, and the amount of NHIS that cannot be cleaned up. The truck route avoids the major surface water bodies near the Guadalupe Field. For most portions of the truck route, a spill would not directly threaten any surface water features and, with appropriate spill response resources, most or all of spilled soils should be recovered without significant losses due to dispersion by wind or runoff. CPD/DP D890558D Condition F38 requires Unocal to have an agency-approved oil and fuel spill contingency plan, and this existing plan should be revised or a similar plan prepared to address response for spilled NHIS involving trucks en route to the Landfill. The truck loads of NHIS will be covered to minimize loss of materials during transit to the Landfill. The presence of a tarp or cover is also expected to reduce potentials for spreading if the truck is overturned. Further, the volume of material associated with a single spill event (e.g., 8 or 16 cubic yards) is considered too small to cause adverse impacts related to contamination of the spill site or altered stormwater drainage, flooding, or siltation. While a small spill could contribute to the existing potential for polluted runoff and/or degradation of water quality in receiving water bodies, this contribution is likely to be relatively small, and it is considered a minimal impact on water resources. The truck route crosses the Santa Maria River at a location that may have standing water with riparian habitat, as well as undeveloped open areas subject to seasonal ponding (e.g., dune swale or vernal pools) that can represent important habitat for sensitive species. Although unlikely, a spill of NHIS directly into the river or standing water body would be more difficult to recover without causing significant impacts to water quality or biological resources. In addition to direct burial of small water features, impacts to water quality could include increased turbidity, suspended solids, and settle-able solids. CDP/DP D890558D Condition F39 requires Unocal to collect samples as soon as possible following a spill into the Santa Maria River to determine the extent of potential impacts to water quality. Regardless, these impacts would be localized, and impacts associated with cleanup likely would be temporary. Similarly, spilled NHIS is expected to have very low moisture content, with low potentials for any soil contaminants to infiltrate to the aquifer, thereby minimizing potential impacts to ground water quality.	
Impact W.2	Offsite transport and release of NHIS adhering to trucks could contaminate surface waters or aquatic habitats (FSEIR page 5-31).
Mitigation	**W-2.1** Unocal, in coordination with the County OEC, shall monitor the effectiveness of current cleaning and decontamination methods for haul trucks leaving loading areas. If monitoring results indicate that the existing practice of using rumble-pads and tire-brushing is not effectively removing soil from haul trucks Unocal shall implement additional and more effective truck cleanup procedures (e.g., washing each truck following loading, with collection and treatment of wash waters).
Findings	After implementation of the mitigation measures, the proposed project impacts would be *not significant with mitigation* (Class II).
Supportive Evidence: Truck-loading operations would occur at each of the current stockpile sites (TB8 and TB9) and, possibly, at future excavation sites and at the site of portable screening operations. Loading operations are expected to spill NHIS onto the ground and/or	

Surface and Ground Water Quality	
sides of the trucks. Because the loading sites are considered already disturbed, and they do not support standing water or sensitive habitats, spills onto the ground will not appreciably alter contaminant levels at these loading sites or re-contaminate previously remediated areas. NHIS spilled within the loading sites may be subject to transport by wind or surface runoff following rain events. However, the project description proposes to use spray trucks in the loading area and applications of Soil-Sement® (an insoluble, non-toxic, polymer emulsion used to suppress dust generation) to minimize wind dispersion. CDP/DP D890558D Condition F23 also requires that Unocal implement one or more measures to prevent excessive erosion or dispersion of soils when wind speeds exceed 25 mph. Additionally, CDP/DP D890558D Condition F37 requires that materials that can cause turbidity and sedimentation be stored inside bermed areas where surface runoff can be controlled and kept from surface water bodies. Because of the high permeability of site soils, dispersion by runoff is expected to be localized. Contaminated soils that adhere to the surface of the truck or to truck tires may be subject to migration or dispersion out of the loading sites to uncontaminated portions of the Guadalupe Field and/or offsite portions of the truck route. The project description proposes to clean (dry brush) the wheels of each truck after it has been loaded with NHIS. The project description also proposes to place rumble mats (corrugated plates) at the exit to the loading area to dislodge any NHIS that adhere to the truck tires. Nevertheless, with the large number of truck trips proposed, subsequent release and accumulation of fugitive soils over a period of months to years could represent a longer-term potential for contamination of presently uncontaminated areas and/or potentials for future transport into surface waters. Accumulations of fugitive soils could occur along the truck route, but the magnitude of accumulation, and potentials for subsequent dispersion, is expected to decrease with distance from the loading area. This means that any detectable impact would be expected to occur mainly within the Guadalupe Field.	
Impact W.3	Erosion of sand dunes and agricultural drainage systems due to road widening, truck traffic, and truck staging could alter local drainage patterns (FSEIR page 5-32).
Mitigation	**W-3.1** During road construction and trucking operations, Unocal's traffic control plan shall include added traffic control measures such as (1) placing a flagman and traffic cones to prevent trucks from passing along narrow portions of the onsite route with non-paved shoulders, (2) creating turn-outs to minimize erosion from truck traffic, and (3) installing temporary erosion control measures (e.g., silt fences) as needed, where there are construction activities, along truck routes to minimize dispersion of eroded soils. **W-3.2** Monitor ditches along Thornberry Road that drain agricultural fields and work with the landowner/jurisdictional agency to repair any erosion related to project truck staging or transport activities.
Findings	After implementation of the mitigation measures, the proposed project impacts would be *not significant with mitigation* (Class II).
Supportive Evidence: The proposed truck route within the Guadalupe Field (primarily the Main Road or TB9 Road) contains narrow, single lane roads with unpaved shoulders of uncompacted sand. The proposed project could involve up to 150 round trips per day of trucks to the Landfill during peak periods of activity. Additional trips onsite may be required if excavated materials need to be transported to one of the stockpile sites for subsequent loading. Portions of some of the main roads onsite may be repaved (total of 7,800 feet of the road length) and/or widened (8,600 feet of the road) to accommodate the truck movements. Regardless, repeated truck traffic over unpaved shoulders as a result of increased frequency of large trucks passing one	

Surface and Ground Water Quality
another along narrow portions of the onsite roads may increase the rate of erosion of the dunes along the truck route. Onsite erosion could cause minor and localized changes in surface runoff patterns, but this is not expected to represent a significant risk of contaminating surface or ground water or threatening structures within the drainage system. Road improvements would not cause significant changes in runoff patterns or the rates or magnitude of ground water recharge because the total area of roadway that is planned for paving is small relative to the unpaved portions of the Guadalupe Field. The proposed project may also stage trucks on the shoulder of Thornberry Road that leads into the Guadalupe Field. The shoulder of the entrance road also forms the banks of drainage ditches associated with the agricultural fields that are immediately adjacent to the Guadalupe Field. A portion (0.5 miles) of Thornberry Road could be widened. Regardless, repeated traffic on the dirt shoulders could promote erosion of soils into the drainage ditches, causing localized flow restrictions. CDP/DP D890558D Condition F94 requires Unocal to monitor road conditions and restore roads damaged by truck-related traffic to pre-project conditions. However, unless the drainage ditch berms are also monitored and repaired, erosion could dam the flow, causing small floods of agricultural drainage waters onto the surface roads or agricultural fields.

Onshore Biological Resources	
Impact BIO.1	Road widening, paving, and placement of road base material within the Guadalupe Field could result in the removal or degradation of vegetation and wildlife habitat and the potential removal of sensitive plant species (FSEIR page 5-57).
Mitigation	**BIO-1.1** If road-widening activities are conducted, Unocal shall mitigate loss of backdune habitat and sensitive plant species individuals and habitat and reduce impacts associated with the loss of habitat by implementing the restoration of an equal number of acres of backdune habitat at other currently disturbed or degraded locations within the Guadalupe Field (such as areas degraded by infestations of invasive species). Unocal shall implement the guidelines of the approved Habitat Revegetation, Restoration, and Monitoring Plan (Condition F64) for areas restored as a result of road widening. To minimize temporal losses, the restoration would need to be initiated before or concurrently with the road widening project.
Findings	After implementation of the mitigation measures, the proposed project impacts would be *not significant with mitigation* (Class II).
Supportive Evidence: Implementation of the proposed road widening, paving, and placement of road base materials would affect approximately 2.0 acres of backdune habitats, including dune scrub, open sand, and disturbed areas. Road-widening activities would not encroach on dune swale habitats, including the L-11/M-12 wetland site, and would not have any effect on dune swale vegetation or wildlife habitats. Unocal estimates approximately 8,600 linear feet of road widening could be required, with an estimated ten-foot-wide disturbance corridor (approximately 2.0 acres). Disturbance to open sand areas has the potential to cause destabilization of dunes and accelerate sand movement. Areas of open sand that would potentially be affected by project activities are located along the Main Road. At these sites, sand movement often encroaches on the road itself, and sand is periodically removed from the road to maintain access. With regard to open sand habitats, it is not likely that the road repaving or widening activities in these locations	

Onshore Biological Resources	
would result in a substantial change to the existing conditions. Impacts on backdune habitat from proposed project activities are likely to include removal of individuals of sensitive plant species, including two CNPS List 1B species (Blochman's leafy daisy and dune mint) and three CNPS List 4 species (California spineflower, suffrutescent wallflower, and Nuttall's milk-vetch). The prevalence of the non-listed sensitive plant species within the dune scrub habitats is an indication of the condition and biological significance of this habitat type. At a minimum, Blochman's groundsel is a common component of the dune scrub vegetation on the project site and is likely to be present at or near all sites affected by the proposed project activities. Though the other species listed above are not as widespread, there is a high potential for one or more of these species to be affected by project activities. However, it is expected that relatively few individuals of these plant species would be removed or damaged, representing a very small percentage of the population or habitat for these species.	
Impact BIO.3	Use of the proposed haul routes in the Guadalupe Field for offsite hauling near existing dune swale wetlands could result in disturbance and mortality to wildlife including the California red-legged frog, federally listed as threatened (FSEIR page 5-60).
Mitigation	**BIO-3.1** Unocal shall not begin any hauling activities along the Main Road Entrance wetlands or the M12/L11 Valley during the red-legged frog migration period (from November 1 through June 1) until the Sensitive Species Management Plan (SSMP) (described below in BIO-3.2) has been revised to add provisions for the hauling activities to protect California red-legged frogs and other wildlife and the revised SSMP has been approved by the County OEC, CDFG, and the USFWS. **BIO-3.2** Unocal shall revise the Sensitive Species Management Plan to include measures that would be implemented to protect California red-legged frogs, and other non-listed sensitive and common wildlife species potentially affected by hauling activities near known or potential habitat. The revised SSMP shall be approved by the USFWS, CDFG, and the County OEC and shall include measures such as the following: • Unocal shall implement a speed limit of 15 mph along the main haul road adjacent to dune swale wetlands in the M12/L11 Valley and the Entrance Road wetlands during the California red-legged frog breeding season when it is raining, the roads are wet, or after daylight. Signs detailing speed limits shall be posted in appropriate locations along the route. • Biologists shall survey the active portions of the haul route within 200 feet of sensitive resources, including the dune swale wetlands, at least four times per day during hauling activities when it is raining or the roads are wet. • If a substantial number of mortalities, as identified in the revised SSMP, continue to occur along the haul route after implementing the above mitigation, Unocal shall halt hauling activities on the roadways adjacent to dune swale wetlands during the California red-legged frog migration period until additional protective measures are determined and approved by the County OEC, USFWS and

Onshore Biological Resources	
	CDFG or for the duration of the specific migration event (as determined by Unocal and the County OEC) to reduce wildlife mortality.
Findings	After implementation of the mitigation measures, the proposed project impacts would be *not significant with mitigation* (Class II).

Supportive Evidence: Increased traffic on the haul route would substantially increase the potential for habitat destruction and wildlife injuries and mortalities; would discourage wildlife use; and would reduce the availability of water sources for wildlife species including several sensitive species such as western spadefoot toad, red-sided garter snake, two-striped garter snake, and California red-legged frog (federally listed as threatened). Other wildlife species potentially affected include several avian species such as raptors, owls and yellow warbler (CSC), and other birds that forage and nest in this habitat. These bird species may be frightened from the area, or their breeding might be disturbed.

California red-legged frogs are known or have historically been present along the proposed haul route in both the Entrance Road wetlands and the M12/L11 dune swale wetland complexes. This species has been observed on paved roads throughout the Guadalupe Field during rain events and during the breeding season on several occasions. California red-legged frogs are known to move between different wetlands on the Guadalupe Field, and large-scale movements most often occur during rainy winter and spring nights. On these occasions, frogs can be expected to appear almost anywhere on the Guadalupe Field. Mortality to individuals of this species resulting from increased traffic near suitable habitat would be significant because of the threatened status of this species and its vulnerability to local extirpation.

La Graciosa thistle, a federally and State-listed threatened plant species, occurs in the dune swale habitats in the vicinity of the haul route. However, the proposed project activities, including road widening and hauling NHIS offsite, would not encroach on and would not have any effect on La Graciosa thistle individuals or habitat.

Unocal has implemented a field-wide speed limit of 25 mph. Speed limits are further reduced in portions of the Guadalupe Field (including the Main Road adjacent to the Entrance Road wetlands) to 15 mph during rain events or when driving occurs after nightfall. In addition, biologists survey all main routes on the Guadalupe Field each morning prior to any activities onsite (which is the primary period when wildlife would be expected to be present on the haul route) and periodically during the day. Wildlife observed on roads is moved to safe habitat. Unocal has also implemented a temporary shutdown of the Main Road during the unusual event that sensitive wildlife species are observed to be present on the Main Road. However, even with these Unocal-implemented precautions, individuals of sensitive as well as common wildlife species inhabiting or migrating to or away from the dune swale wetlands are still killed on the main roads, including the portion of road near the dune swale wetlands. Mortalities would be expected to increase with the substantial increase (proposed to include an increase of up to 300 truck trips each day) in traffic on the Main Road.

Impacts to California red-legged frogs include the unavoidable potential for mortality of individual frogs. This residual impact is not likely to have a substantial effect on the Guadalupe Field-wide population due to the implementation of protection measures BIO-3.1 and BIO-3.2. These measures, which include compliance with the any Federal authorization for take of listed species (i.e., a Biological Opinion, etc.) and a revised Sensitive Species Management Plan with protection measures including speed limits, regular monitoring of areas most likely to support red-legged frogs, and temporarily halting activities on the haul road if necessary.

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Air Quality	
Impact AQ.2	The air emissions from project operation would exceed significance thresholds. (FSEIR page 5-108).
Mitigation	**AQ-2.1** In coordination with the SLO APCD, the Applicant shall update the APCD-approved Dust Control Plan to include additional mitigation measures if determined necessary by the OEC: a. If the OEC determines that using dry decontamination methods to remove impacted material from the exteriors of trucks used to haul NHIS offsite is not sufficiently removing the impacted material such that it is being tracked outside the loading area, Unocal shall install wheel washers where vehicles enter and exit public streets, or wash off trucks and equipment leaving the site. b. Sweep streets at the end of each day if visible soil material is carried by or spilled from the trucks hauling NHIS off the project site and deposited onto public roads. Water sweepers with reclaimed water should be used where feasible. **AQ-2.2** If required by the APCD, the Applicant shall update the APCD-approved Emission Reduction Plan to include additional mitigation measures: a. Development of a comprehensive construction activity management plan designed to minimize, as feasible, the amount of large construction equipment operating during any given time period; b. Scheduling of construction truck trips, as feasible, during non-peak hours to reduce peak hour emissions; c. Limiting the length of the construction work-day period, if necessary and feasible, during periods with high air pollutant levels; d. Phasing of construction activities, if appropriate and feasible. a. Use of direct injection (ID) diesel engines (or equivalent) together with proper maintenance and operation to reduce emissions of NO_x; b. Electrify equipment where feasible; c. Maintain all fossil-fuelled equipment in tune per manufacturer's specifications, except as otherwise required above; d. Encourage use of catalytic converters on gasoline-powered equipment; e. Substitute gasoline-powered for diesel-powered equipment, where feasible; f. Use compressed natural gas (CNG) or propane-powered portable equipment (e.g., compressors, generators, etc.) onsite instead of diesel-powered equipment, where feasible; g. All off-road and portable diesel-powered equipment, including but not limited to bulldozers, graders, cranes, loaders, scrapers, backhoes, generator sets, compressors, auxiliary power units, shall

Air Quality	
	be fuelled exclusively with CARB-certified motor vehicle diesel fuel. Off-road equipment may use tax-exempt motor vehicle fuel if not operated on public roads; h. Maximize, to the extent feasible, the use of diesel construction equipment meeting the CARB's 1996 or newer certification standard for off-road heavy-duty diesel engines. i. All on- and off-road diesel equipment shall not be allowed to idle for more than 5 minutes. Signs shall be posted in the designated areas to remind drivers of the 5-minute idling limit. j. Portable equipment with engines greater than 50 horsepower used during the activities covered under the SEIR may require California state-wide portable equipment registration (issued by the CARB) or an APCD permit. Operational sources, such as back up generators, may also require APCD permits. To minimize potential delays, prior to start of the project, the Applicant shall contact the APCD representative for specific information regarding permitting requirements of these types of equipment. **AQ-2.3** Unocal shall fund a SLO County APCD-managed air-emission-reduction program (AER Program) designed to achieve timely, real, quantifiable criteria and diesel PM reductions to offset project emissions. The EIR estimates that the project's NO_x emissions will be 90 tons. This project emission estimate shall be refined by Unocal using information about the actual fleet and the scheduling that will be used for the project. The refined estimate shall be submitted to the APCD for review and approval. The approved refined NO_x emission estimate shall be used by the APCD to set the necessary funding amount for the AER Program. Payment shall be submitted to the APCD in 4 quarterly payments, with the first payment commencing after the refined emission estimate is approved and the total funding amount is finalized.
Findings	After implementation of the mitigation measures, the proposed project impacts would be *not significant with mitigation* (Class II).

Supportive Evidence: Summaries of the project operational emissions are presented in the Table 5.5.8 of the FSEIR (page 5-109). Conservative assumptions were used in developing these emissions. As the data in Table 5.5.8 shows, the operational emissions are above the significance thresholds for ROC, NO_x, and PM_{10}. The ROC emissions were estimated to be as high as 13.1 lbs per day, which is above the thresholds of 10 lbs per day. The ROC emissions per year were below the threshold. The NO_x emissions were estimated to be as high as 276.8 lbs per day and 33.38 tons per year, which is above the thresholds of 10 lbs per day and 25 tons per year. The PM_{10} emissions were estimated to be as high as 19.4 lbs per day, which is above the thresholds of 10 lbs per day. The PM_{10} emissions per year were below the threshold.

The SLO APCD has evaluated the project-related emissions estimated in the FSEIR. Based on this evaluation the APCD has decided to set an appropriate fee to mitigate the excess NO_x emissions from the project trucking operations as described in Mitigation Measure AQ-2.3. If fully implemented, the mitigation measures would be able to either reduce the project emissions or offset them to insignificant levels.

Transportation/Circulation		
Impact T.1	Offsite vehicle trips to haul NHIS to Santa Maria Landfill could impact traffic flow on Betteravia Road during PM peak commuting hours (FSEIR page 5-141).	
Mitigation	**T-1.1**	Truck-hauling traffic shall be restricted from travel between the Guadalupe Field and the Santa Maria Landfill on Betteravia Road between the hours of 4:30 p.m. and 5:30 p.m. (evening peak hour), except as otherwise approved by the OEC.
Findings	After implementation of the mitigation measures, the proposed project impacts would be *not significant with mitigation* (Class II).	

Supportive Evidence: The majority of transportation impacts would come from trucks hauling NHIS offsite. The proposed project is to haul the NHIS to the City of Santa Maria Landfill at 2065 E. Main Street. This facility is located in Santa Barbara County, approximately 16 miles from the Field. However, the trucks would drive to the Santa Maria Landfill using a slightly longer route. This route was proposed to avoid traveling through downtown Santa Maria on Main Street, which is congested. Trucks would return to the Guadalupe Field by reversing their route to the solid-waste-handling facility.

Pursuant to the 1998 EIR (ADL 1998) findings, the Applicant proposed to restrict project-related traffic from travel on Route 166 (Main Street) between Highway 1 and Highway 101 between the hours of 4:30 p.m. and 5:30 p.m. However, this restriction would not mitigate the main congestion related to the current proposed project. The roadway segment that has the most congestion along the proposed NHIS-hauling route is on Betteravia Road between Blosser Road and Highway 101. It is projected that in 2007, the portion of Betteravia Road from Miller to Highway 101 would operate at LOS of D, and addition of 300 trips per day from the project would not change the LOS of this road segment. The City of Santa Maria policy deems ADT with the LOS of D as acceptable.

Betteravia Road and Broadway Street (also known as State Route 135) are in the CMP-designated roadway system. The CMP-designated roadways are required to be examined against the CMP thresholds only for those projects generating 500 ADT, or peak-hour traffic of 50 trips. The proposed project would generate only 300 ADT and 38 maximum trips during short-term periods of peak project activity through Betteravia Road, and an average of 9 truck trips per hour. The peak-hour project-related traffic consists entirely of heavy trucks, and trucks affect a roadway LOS more severely than lighter vehicles.

These heavy trucks will affect roadways and intersections that, in 2007, are expected to operate at LOS of C or D, specifically Betteravia Road and the intersections of Betteravia Road with Broadway Street and with Miller Road. Therefore, it was determined that the CMP thresholds for the peak-hour traffic would be more applicable in this case to the roadways designated as CMP than to the City of Santa Maria thresholds.

Analysis of current LOS of the intersections of Betteravia Road shows that the intersection with Broadway operates at LOS of D during peak hours. In the future, this situation will worsen due to population growth and subsequent increase in traffic. However, the peak-hour LOS for 2007 would remain at LOS D if the same growth rate of 3% per year is applied to the current intersection data. The intersection of Betteravia and Miller would operate at LOS of D, with and without the project. Applying the SBCAG thresholds, the impact would be potentially significant because more than 20 peak-hour vehicle trips would affect two of the CMP intersections (Betteravia and Broadway and Betteravia and Miller) that operate at LOS of D.

Agricultural Resources		
Impact AG.2	The offsite hauling of NHIS would increase truck trips in the vicinity of the Thornberry Road staging area, which would limit access to agricultural areas and limit movement of agricultural crops and equipment in the area and conflict with existing San Luis Obispo County agricultural goals (FSEIR page 5-217).	
Mitigation	**AG.2.1**	A "driveway" through the truck staging area, connecting Thornberry Road to the farm equipment staging area shall be delineated using construction stakes or other means. This driveway shall be at least 20 feet in width to allow for two way traffic to and from the farm equipment staging area. Trucks shall be prohibited from blocking this driveway at all times.
	AG.2.2	Advanced notification (1 week) shall be provided to farmers adjacent to the Thornberry Road staging area prior to project activities that would result in more than 100 truck haul round-trips per day.
Findings	After implementation of the mitigation measures, the proposed project impacts would be *not significant with mitigation* (Class II).	
Supportive Evidence: The proposed staging area along Thornberry Road would be located in the shoulder area of the existing road, in an area currently used for assembling harvesting equipment and agricultural worker parking. It is assumed that the existing assembly area would be relocated further back from Thornberry Road. The new placement of the farm equipment staging area relative to the truck staging area would require farm equipment movement through the truck area. This would adversely affect the farmers' ability to conduct agricultural operations (e.g., due to greater difficulty in getting on and off the road during times of harvest, having to work farther away from the road due to increased truck traffic).		

Public Safety		
Impact PS.2	The offsite transportation of NHIS could introduce an increase in fatalities on local area streets due to the increase in vehicle traffic (FSEIR page 5-231).	
Mitigation	**PS-2.1**	Implement a review system for truck carriers contracted for offsite NHIS hauling to ensure that only those with the safest records can carry loads. This would include addressing issues related to: a review of CHP Mister reports, ensuring correct Class licensing, enrollment in a controlled substance and alcohol abuse program, completion of Motor Carrier Safety Review type safety questionnaire, and assessment of Bureau of Motor Carrier Safety Ratings.
	PS-2.2	Ensure that trucking companies contracted for offsite NHIS hauling have programs in place to ensure that drivers maintain appropriate speeds. This would include: a 55-mph or applicable speed limit policy, training on speeding and speed limits along the proposed route, and/or speed control systems or governors in place on trucks.
	PS-2.3	Ensure that contracts made with trucking companies hauling NHIS

Public Safety	
	offsite address safety reviews, speeding and violations, and unacceptable incentive practices, such as increased pay for increased numbers of loads that may be an incentive for drivers to act in an unsafe manner.
Findings	After implementation of the mitigation measures, the proposed project impacts would be *not significant with mitigation* (Class II).
Supportive Evidence: The project proposes up to 860,000 truck-miles annually for two years during the course of the project. This number could range down to half that amount, or 430,000 annual truck-miles, if the project is extended to four years. Transportation of NHIS would pass through Santa Maria along Betteravia Road, over Highway 101, to the Santa Maria Landfill. Some limited areas of the route would pass by residential areas near Highway 101. Because this level of truck transport would produce risks that exceed $1x10^{-3}$ fatalities per year, this would be considered a *significant* impact. However, with mitigation measures that ensure good driver hiring practices and driver records, good training, and controlling speeding, the risks would be reduced to less than 1x10-3 fatal accidents per year (see table 5.11-1). Mitigation effectiveness estimates are based on studies conducted for the transportation of hazardous materials in Santa Barbara County and the associated reductions in accident rates associated with the above listed mitigations (SBC 2004). The reduction percentages were generated by examining the rates of accidents due to speeding and traffic violations along Southern California highways over a 10-year period and combining those rates with estimates of mitigation measure effectiveness. With the mitigation, the impacts would be reduced to less than significant.	

IX. Potential Significant Unavoidable Effects for Which Sufficient Mitigation Is not Available

No significant and unavoidable impacts (Class I) were identified for the proposed project.

X. Cumulative and Growth Inducing Impacts

Cumulative Impacts

State CEQA Guidelines Section 15355 defines cumulative impacts as

> *"two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts".* Further, *"the cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time".*

The Guidelines require the discussion of cumulative impacts to reflect the severity of the impacts and their likelihood of occurrence. However, the discussion need not be as detailed as the analysis of impacts associated with the project, and should be guided by the rule of reason. Cumulative impacts associated with Guadalupe Restoration Project are discussed in the topical analysis sections provided in Section 5.0 of the Final SEIR.

Findings:

1. Development projects that are in the vicinity of the truck transportation routes to the Santa Maria Landfill and that would occur during the next two to four years could create significant cumulative impacts to traffic. The traffic impacts of the project have been mitigated to insignificant, but with the additional traffic of other development projects in the areas the cumulative traffic impacts could be significant.
2. Cumulative air quality impacts associated with the truck transportation to the Santa Maria Landfill combined with other development projects in the vicinity of the truck routes could result in significant cumulative air impacts. The air quality mitigation for the proposed project would reduce the project's air impacts to insignificant, but the additional air emission from other development projects in the area could result in significant cumulative air impacts.

Growth-Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines states that growth-inducing impacts of the proposed project must be discussed in the EIR. In general terms, a project may induce spatial, economic, or population growth in a geographic area if it meets any one of the four criteria identified below:

1. Removal of an impediment to growth (e.g., establishment of an essential public service or the provisions of new access to an area).
2. Economic expansion or growth (e.g., changes in revenue base, employment expansion, etc.).
3. Establishment of a precedent setting action (e.g., an innovation, a change in zoning, or general plan amendment approval).
4. Development or encroachment in an isolated area or one adjacent to open space (being different from an "infill" type of project).

Should a project meet any one of the above listed criteria, it can be considered growth inducing. The impacts of the proposed project are evaluated below with regard to these four growth-inducing criteria.

Findings:

The proposed project would not result in the establishment of an essential public service and would not provide new access to an area previously inaccessible. As a result, this project is not considered to cause significant growth inducement as it relates to fostering economic or population growth or additional housing.

Short-term economic growth would occur as a result of the increased activity associated with the transportation activities. The economic growth would be in the area of contracting trucks to haul the material to the landfill. This would be expected to last two to four years. The workers associated with the transportation would more than likely contribute to a small increase in business activity for some of the local businesses, especially the food service industries.

Long-term project employment prospects are extremely limited. Therefore, there would be no new significant employment associated with the proposed project. While the proposed project will result in some short-term increase to the County's existing revenue base, the operational activities would not result in any substantial increase to the revenue base. Therefore, due to the short-term and limited nature, economic growth associated with this project is not considered to be significant.

Disposal of NHIS at landfills is a relatively common practice. The Santa Maria Landfill is authorized to accept these types of materials as part of their NHIS program. For the past few years, the Santa Maria Landfill has been accepting non-hazardous impacted soils for use in closing cells. As such, the proposed project would not be considered a precedent setting action.

Development of open space is considered growth inducing when it encroaches upon urban-rural interfaces or in isolated localities. The proposed project would take place in a previously disturbed area, and would not involve the development of open space. Therefore, the proposed project is not considered to be growth inducing under this criterion, since the available sites do not encroach upon urban-rural interfaces.

In summary, the proposed project would not meet any of the four growth inducing criteria specified above. As a result, the proposed project would not considered to be growth inducing.

XI. Findings Regarding Alternatives to the Proposed Project

Alternative Screening Process

A screening approach to the alternatives analysis was developed. This approach meets the legal requirements of CEQA; assures that an EIR evaluates a reasonable range of alternatives; and minimizes the number of alternatives that are carried forward for analysis in the EIR. This approach also assures that only alternatives that offer some level of environmental advantage over the proposed project are evaluated throughout the EIR. If an alternative was found to be technically infeasible or could not accomplish most of the basic objectives of the project, then it was dropped from further consideration. These was the primary factors that was used to eliminate an alternative without further screening analysis.

As part of the original 1998 EIR for the Guadalupe Restoration Project over 100 alternative treatment and disposal technologies were evaluated in the screening analysis. As part of this SEIR a review of the 1998 EIR alternatives was conducted and a revised screening analysis was conducted on a select number of potential alternatives to the proposed project. These alternatives included the following:

- No Project Alternative
- Thermal Desorption
- Landfarm followed by Treated Material Land Feature (TMLF)
- Slurry Injection (Deep Well Reinjection)
- Engineered Containment Unit (ECU)
- Trucking to Other Destinations
- Rail transportation of NHIS (Solid Waste Landfill)

Only a few alternatives from the list above were carried forward and analyzed throughout the EIR; the other alternatives were dropped from the analysis. The alternatives that were selected for analysis include:

- Landfarm followed by Treated Material Land Feature (TMLF)
- Slurry Injection (Deep Well Reinjection)
- Engineered Containment Unit (ECU)
- Trucking to Other Destinations

With the No Project Alternative, all the NHIS would be left in place and the additional NHIS from future excavations would be stocked piled at the site. The No Project Alternative was dropped from further consideration because it is inconsistent with the San Luis Obispo Coastal Land Use Ordinances. The San Luis Obispo County Coastal Plan Policy 3 for Energy and Industrial Facilities states:

> *Upon completion or abandonment, all above-ground oil production and processing facilities shall be removed from the site, and the area in which they were located shall be restored by appropriate contouring, reseeding, and planting to conform with surrounding topography and vegetation. [This policy shall be implemented pursuant to Section 23.08.174 of the Coastal Zone Land Use Ordinance.]*

Since the No Project Alternative would not be allowed under the San Luis Obispo County Coastal Zoning Ordinance, it was been dropped from further consideration.
Each of the selected alternatives that were analyzed in the Final SEIR are discussed below.

Treated Material Land Feature (TMLF)	
Description	The TMLF project is the construction (recontouring into a dune feature and restoring the surface) of the TMLF after treatment via a "treat up" LTU located at TB9. The TMLF would be located at TB9. In a "treat up" LTU, each successive lift of NHIS would be placed and treated directly on top of the previous one. The final result would be a stockpile of treated material in an LTU configuration. After recontouring and restoration, the TMLF would be monitored and maintained using the existing LTU facilities until the treated material is determined by the RWQCB to no longer be a threat to the environment. At that point, the site would be decommissioned and left to natural processes. The TMLF could also be constructed after excavated material is treated by some means other than LTU, such as thermal desorption (TDU). In this case, treatment may be conducted at TB9 or at an alternate location, and treated material would be stockpiled at TB9 within the TMLF footprint. The proposed LTU at TB9 with a 16.4-acre footprint would provide an average treatment area of eleven acres. Treating 660,000 cubic yards (cy) of affected soils in this LTU could take up to seven years. It is anticipated that the NHIS will be contained in the TMLF by a silt/clay-amended liner placed under the NHIS. If required by the RWQCB, an HDPE (high-density polyethylene) liner may be placed above the silt/clay liner. Monitoring wells and a leachate collection system will be installed as required by the RWQCB. An estimated 860,000 cy of NHIS will be excavated under CAO 98-38. Of this amount, 200,000 cy would be sump material containing heavy hydrocarbons that may be unsuitable for treatment and reuse and, therefore, might have to be transported offsite. It is anticipated that up to 660,000 cy of NHIS could be treated and subsequently reused as the TMLF.
Finding	For this alternative, most impacts that are related to offsite trucking of NHIS would be lessened in severity (e.g., biological resources, water quality, air quality, traffic, noise, agricultural) but their severity classification would not change. Impact PS.2, transportation risk, would reduce in classification from Class II to Class III due to the reduction in the number of truck trips. Under this alternative, however, there would be two new significant-but-mitigable

Treated Material Land Feature (TMLF)	
	Class II long-term impacts. **W.5** If a TMLF is implemented, failure of the leachate or runoff collection and treatment system could result in hydrocarbon migration into the dune sand aquifer or offsite. **(Class II)** **BIO.6** Disturbance of the topsoil associated with the TMLF would result in the removal or degradation of vegetation and wildlife habitat and removal of sensitive plant species. **(Class II)** While this alternative would lessen severity of many transportation-related impacts as compared to the proposed project, it would result in two new Class II impacts, one in biology and one in surface/ground water quality. These two impacts would be long-term impacts. This alternative would also eliminate a number of insignificant impacts associated with the use of the Guadalupe material at the Santa Maria Landfill that were identified in the May 2004 Santa Maria Landfill Supplemental EIR. However, if the Guadalupe NHIS is not sent to the Santa Maria Landfill, then other NHIS material would have to be found for use in closing the landfill cells. As such, many of the transportation-related impacts would still occur, since the material needed for closing the cells would still have to be delivered to the landfill. A number of the mitigations identified for the proposed project would also apply to this alternative [See Alternative Impact Summary Table (SEIR pageIS-11)]. The SEIR proposed a number of additional mitigation measures for this alternative that are listed below. **W-5.1** If a TMLF or ECU is implemented, develop contingency plans for responses to failures of the leachate collection, runoff collection, and ground water monitoring systems. **BIO-5.1** If a TMLF is implemented, Unocal shall mitigate the loss of backdune habitat and sensitive plant species individuals and habitat resulting from implementation of this alternative, and reduce impacts associated with the loss of this habitat by restoration of the completed TMLF to dune scrub habitat. Unocal shall incorporate the restoration site and the TMLF into the approved Habitat Revegetation, Restoration, and Monitoring Plan (CDP/DP D890558D Condition F64) for this restoration. To mitigate the temporal loss of dune scrub habitat, Unocal shall restore 4.9 acres of habitat to dune scrub at other currently disturbed or degraded locations within the Guadalupe Field (such as areas degraded by infestations of invasive specie). Unocal shall incorporate the restoration site(s) into the Habitat Revegetation, Restoration, and Monitoring Plan s approved by the County, CDFG, and Coastal Commission within 6 months of project approval.

Offsite Trucking to Other Destinations	
Description	This alternative would involve the trucking of the NHIS from the Guadalupe Site to another landfill in California. Destinations other than the Santa Maria Landfill for the offsite trucking would include: • Clean Harbors Environmental Services Facility at Buttonwillow,

Offsite Trucking to Other Destinations	
	• Waste Management at McKittrick, or • Kettleman Hills Offsite trucking for these destinations would have the same elements of site description, mobilization, and onsite operations as the proposed project, however, the distances of travel would be greater.
Finding	This alternative is very similar to the proposed project, because the same amounts of NHIS would be transported offsite for disposal. One potentially significant (Class II) transportation impact related to traffic on Betteravia Road would be eliminated. Because of the longer transportation route, this alternative increases the severity of the operational air quality emissions to a Class I impact. Air Quality impact from operations (AQ.2) and public safety impact (PS.4) are both significant and unavoidable impacts associated with this alternative that would not result with the proposed project. A number of the mitigations identified for the proposed project would also apply to this alternative [See Alternative Impact Summary Table (SEIR pageIS-11)].

Engineered Containment Unit (ECU)	
Description	An engineered containment unit (ECU) is essentially the same as the TMLF except that the materials would not be treated first and would be placed directly in the containment area. The TMLF would also have a shorter timeframe until decommissioning than the ECU due to the treatment of the materials before placement in the TMLF. In addition, all of the excavated material, including sump material, could be placed into the ECU, whereas, for the TMLF alternative, the sump material would be transported to the Santa Maria Landfill. The ECU would be located at TB9 and designed with liners and a leachate collection system, as required by the RWQCB. NHIS currently stockpiled at TB8 and TB9, as well as material removed from the remaining CAO excavations, will be placed directly into the ECU. The completed ECU will be graded to drain to the existing TB9 water-handling system and to blend with the surrounding environment, then restored. After restoration, the ECU would be monitored and maintained until the NHIS no longer represents a threat to the environment. It is anticipated that the NHIS will be contained in the ECU by a silt/clay-amended liner placed under the NHIS. If required by the RWQCB, an HDPE (high-density polyethylene) liner may be placed above the silt/clay liner. Monitoring wells and a leachate collection system will be installed as required by the RWQCB. Unocal proposes to cap the NHIS in the ECU with 2–3 feet of clean material to allow degradation to continue through the life of the ECU. However, if required by the RWQCB, the ECU will first be capped with a silt/clay liner and/or HDPE liner. Clean cover material may include subgrade material excavated and stockpiled during construction of the ECU, sand from Q4, and/or other clean material. The ECU would be restored/revegetated to resemble the surrounding dunes.
Finding	For this alternative, most impacts that are related to offsite trucking of NHIS would be lessened in severity (e.g., biological resources, water quality, air quality, traffic, noise, agricultural) but their severity classification would not change. This

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	Engineered Containment Unit (ECU)
	alternative would eliminate two potentially significant Class II biological resources impacts and two potentially significant Class II agricultural resources impacts. Impact PS.2, transportation risk, would be reduced in classification from Class II to Class III due to the reduction in the number of truck trips. Under this alternative, however, there would be one new significant Class I long-term impact and two new potentially significant, but mitigable Class II long-term impacts. **LU.2** The ECU alternative would establish at the Guadalupe Field a permanent depository of NHIS requiring indefinite leachate collection and monitoring. **(Class I)** **W.5** If an ECU is implemented, failure of the leachate or runoff collection and treatment system could result in hydrocarbon migration into the dune sand aquifer or offsite. **(Class II)** **BIO.6** Disturbance of the topsoil associated with the ECU would result in the removal or degradation of vegetation and wildlife habitat and removal of sensitive plant species. **(Class II)** While this alternative would lessen severity of or eliminate many transportation-related impacts as compared to the proposed project, it would result in a new Class I impact in land use and two new Class II impacts, one in biological resources and one in surface/ground water quality. All three of these impacts would be long-term impacts. This alternative would also eliminate a number of insignificant impacts associated with the use of the Guadalupe material at the Santa Maria Landfill that were identified in the May 2004 Santa Maria Landfill Supplemental EIR. However, if the Guadalupe NHIS is not sent to the Santa Maria Landfill, then other NHIS material would have to be found for use in closing the landfill cells. As such, many of the transportation-related impacts would still occur, since the material needed for closing the cells would still have to be delivered to the landfill. A number of the mitigations identified for the proposed project would also apply to this alternative [See Alternative Impact Summary Table (SEIR pageIS-11)]. The SEIR proposed a number of additional mitigation measures for this alternative that are listed below. **W-5.1** If a TMLF or ECU is implemented, develop contingency plans for responses to failures of the leachate collection, runoff collection, and ground water monitoring systems. **BIO-5.1** If a TMLF is implemented, Unocal shall mitigate the loss of backdune habitat and sensitive plant species individuals and habitat resulting from implementation of this alternative, and reduce impacts associated with the loss of this habitat by restoration of the completed TMLF to dune scrub habitat. Unocal shall incorporate the restoration site and the TMLF into the approved Habitat Revegetation, Restoration, and Monitoring Plan (CDP/DP D890558D Condition F64) for this restoration. To mitigate the temporal loss of dune scrub habitat, Unocal shall restore 4.9 acres of habitat to dune scrub at other currently disturbed or degraded locations within the Guadalupe Field (such as areas degraded by infestations of invasive specie). Unocal shall incorporate the restoration site(s) into the Habitat Revegetation, Restoration, and

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Engineered Containment Unit (ECU)	
	Monitoring Plan s approved by the County, CDFG, and Coastal Commission within 6 months of project approval.

Slurry Injection	
Description	Slurry Fracture Injection (SFI or Slurry Injection) is proposed to dispose of NHIS by mixing it with water and injecting this mixture into an underground oil reservoir beneath the former Guadalupe Oil Field (Field). Injection pressures must be high enough to deform and fracture the unconsolidated sand formation, allowing slurry to flow from the well into the reservoir, with solid material deposited in the parting plane and adjacent pore space. The objective of Slurry Injection is to remove NHIS from environmentally sensitive areas and dispose of it deep within a confined oil reservoir. The U.S. Environmental Protection Agency (EPA) regulates injection activities via the Underground Injection Control Program - Class I Wells and/or Injection Well Permit - Class II Wells from the Division of Oil, Gas, and Geothermal Resources. The hydrocarbon-affected sands would be screened and fed into a large hopper, where they would be mixed with water. A screen and/or shaker would be used to separate large particles from the process. A centrifugal transfer pump would be used to convey the slurry material to a storage tank or directly to a pump for high-pressure down-hole injection.
Finding	For this alternative, most impacts that are related to offsite trucking of NHIS would be lessened in severity (e.g., biological resources, water quality, air quality, traffic, noise, agricultural) but their severity classification would not change. Impact PS.2, transportation risk, would be reduced in classification from Class II to Class III due to the reduction in the number of truck trips. Impacts T.1, traffic volume impacts, and T.2, road impacts, would be eliminated. Class II, potentially significant, water quality Impacts W.1 and W.2, biology resources Impact BIO.3, and agricultural resources Impact AG.2 would be eliminated. Class III, insignificant Air Quality Impacts AQ.2 and AQ.4, and Agricultural Resources Impacts AG.1 and AG.3 would be eliminated. Under this alternative, however, there would be one new significant but mitigable Class II impact and two new insignificant Class III impacts. **PS.5** Mechanical hazards associated with high-pressure slurry injection could pose a hazard to the public, regulatory agency personnel, and workers. **(Class II)** **GEO.6** High injection pressures could result in release of injected material from the injection formation. **(Class III)** **W.6** If slurry injection is implemented, contamination of surface and ground water could occur due to release of slurry material containing hydrocarbons from the injection formation. **(Class III)** This alternative would lessen severity of many transportation-related impacts as compared to the proposed project. The additional impacts associated with this alternative would be confined to the Guadalupe Field and could all be mitigated to a level of insignificance. This alternative would also eliminate a number of insignificant impacts associated with the use of the Guadalupe material at the Santa Maria Landfill that were identified in the May 2004 Santa Maria Landfill Supplemental EIR. However, if the Guadalupe NHIS is not sent to the Santa

Slurry Injection	
	Maria Landfill, then other NHIS material would have to be found for use in closing the landfill cells. As such, many of the transportation related impacts would still occur since the material needed for closing the cells would still have to be delivered to the landfill. While this alternative appears to offer a number of advantages over the proposed project, it is not considered a feasible alternative, since the U.S. EPA deep-well injection program would not allow the Class II injection of NHIS because the EPA does not consider the current activities part of oil and gas operations or exploration. **GEO-6.1** If slurry injection is conducted, the Applicant shall implement a monitoring and analysis program for the slurry injection process. The program shall include continuous injection and well pressure monitoring and analysis, continuous injection well temperature monitoring, and periodic injection tracer log surveys, step rate tests in the injection well temperature and pressure monitoring in offset observation wells. This data will be used to assess the distribution of the formation pressures and an evaluation of formation flow behavior. This data will be used to verify containment of the injected material. The Applicant shall submit the monitoring and analysis program to Planning and Building and DOGGR for review and approval prior to the start of slurry injection. The applicant shall submit quarterly monitoring and analysis report to Planning and Building and DOGGR. **PS-5.1** If slurry injection is implemented, amend the Site Safety Plan to address the hazards associated with maintenance and operation of the high-pressure slurry injection system. Provisions to be added to the plan would include information regarding lock-out/tag-out during maintenance or operations to control energy sources, training of employees on the hazards associated with slurry and high pressures, appropriate protective equipment, safe operations and safe operating limits, signage and labeling of hazards, emergency operations procedures, maintenance procedures, and operating procedures.

Environmentally Superior Alternative

CEQA requires that an EIR identify the environmentally superior alternative from among the range of alternatives considered. Based on the analysis provided above and in the topical sections of the Final SEIR, the environmentally superior alternative is the Proposed Project, trucking the NHIS to the Santa Maria Landfill.

XII. Mitigation Monitoring and Reporting Program

Section 21081.6 of the Public Resources Code requires that when a public agency is making findings required by CEQA Guidelines Section 15091(a)(1), codified as Section 21081(a) of the Public Resources Code, the public agency shall adopt a reporting or monitoring program for the changes to the proposed project which it has adopted or made a condition of approval, in order to mitigate or avoid significant effects on the environment.
The Planning Commission hereby finds and accepts that the Mitigation Monitoring Program for the Guadalupe Restoration Project contained in Exhibit D to this staff report meets the requirements of Section 21081.6 of the Public Resources Code by providing for the

implementation and monitoring of mitigation measures intended to mitigate potential environmental effects.

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING

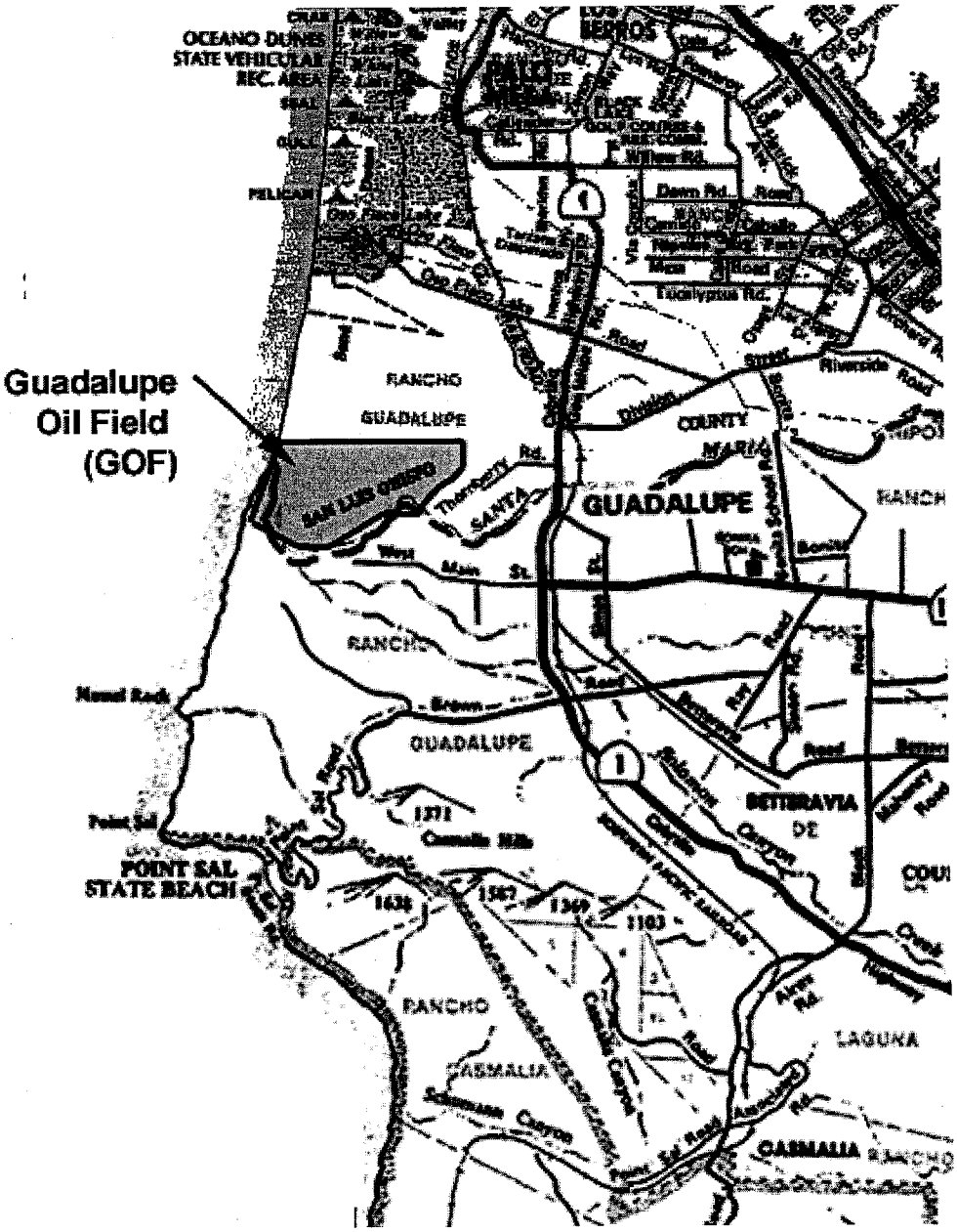
PROJECT

Development Plan/
Coastal Development Permit
Unocal Corporation – D890558D

EXHIBIT

1: GOF Vicinity Map

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING

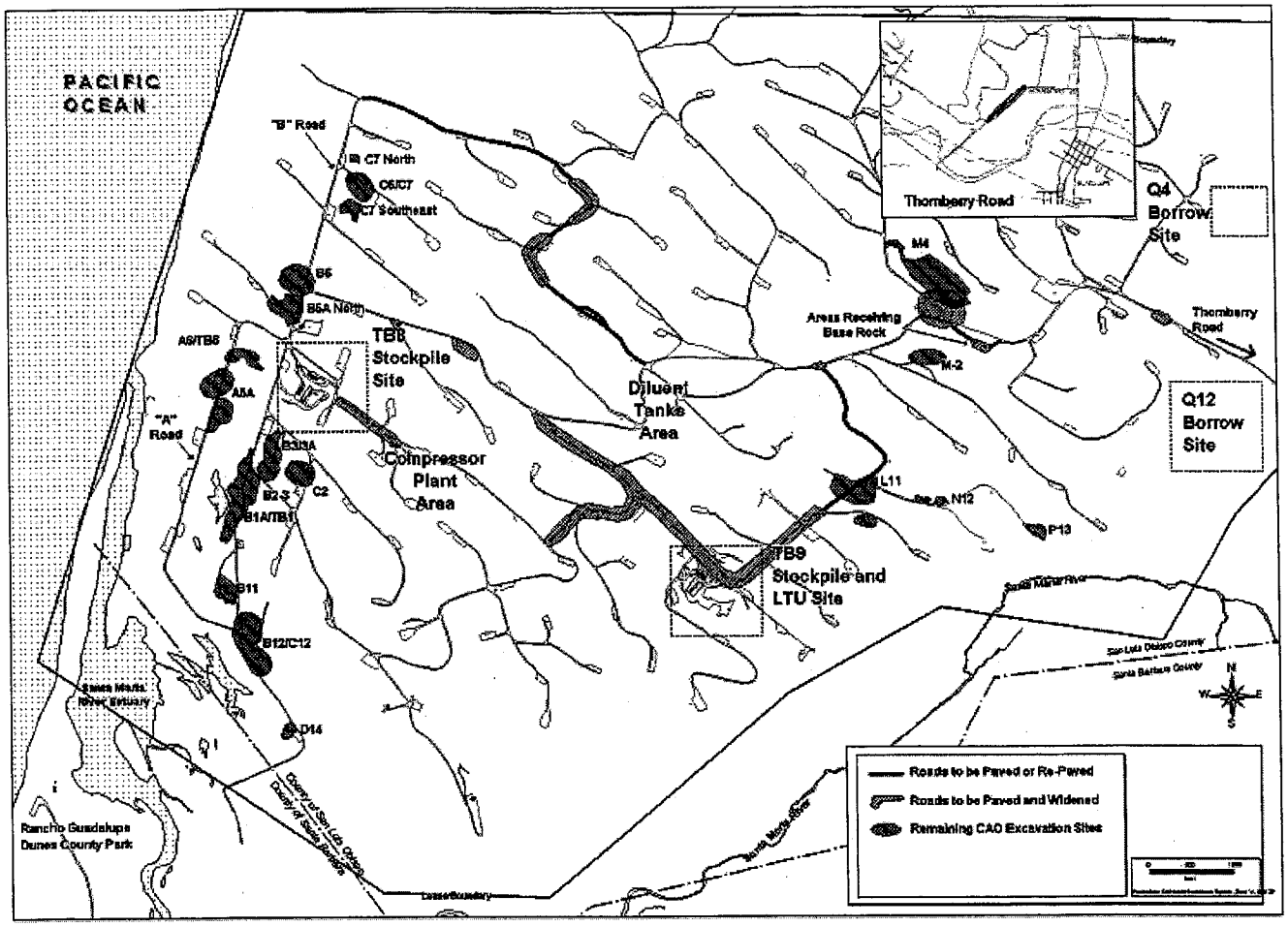


PROJECT

Development Plan/
Coastal Development Permit
Unocal Corporation – D890558D

EXHIBIT

2: GOF Project Location



PROJECT

Development Plan/
Coastal Development Permit
Unocal Corporation – D890558D

EXHIBIT

3: GOF Project Site

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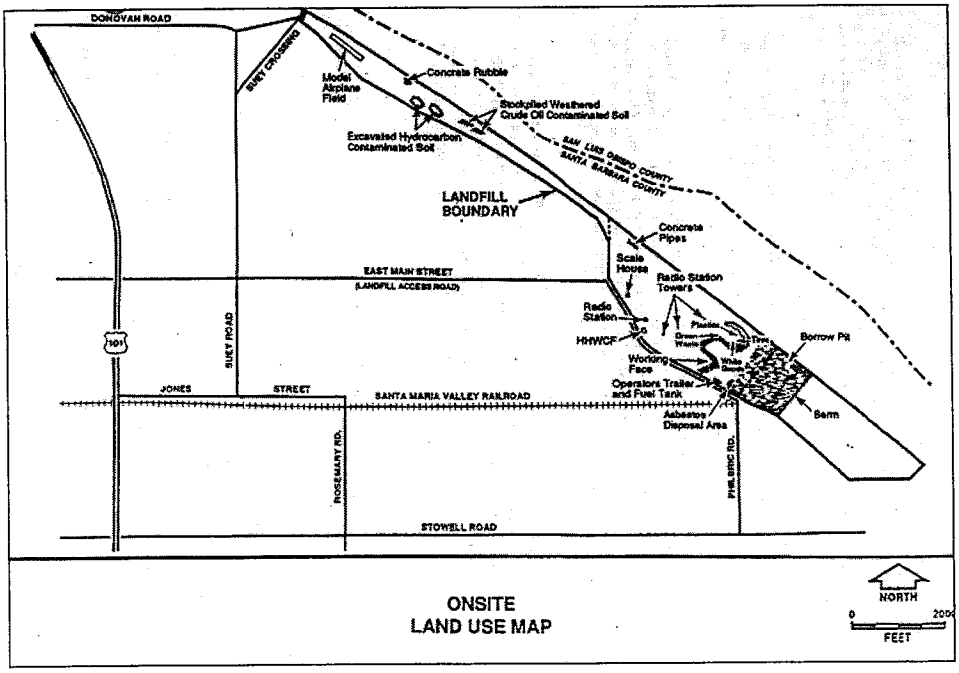
SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING



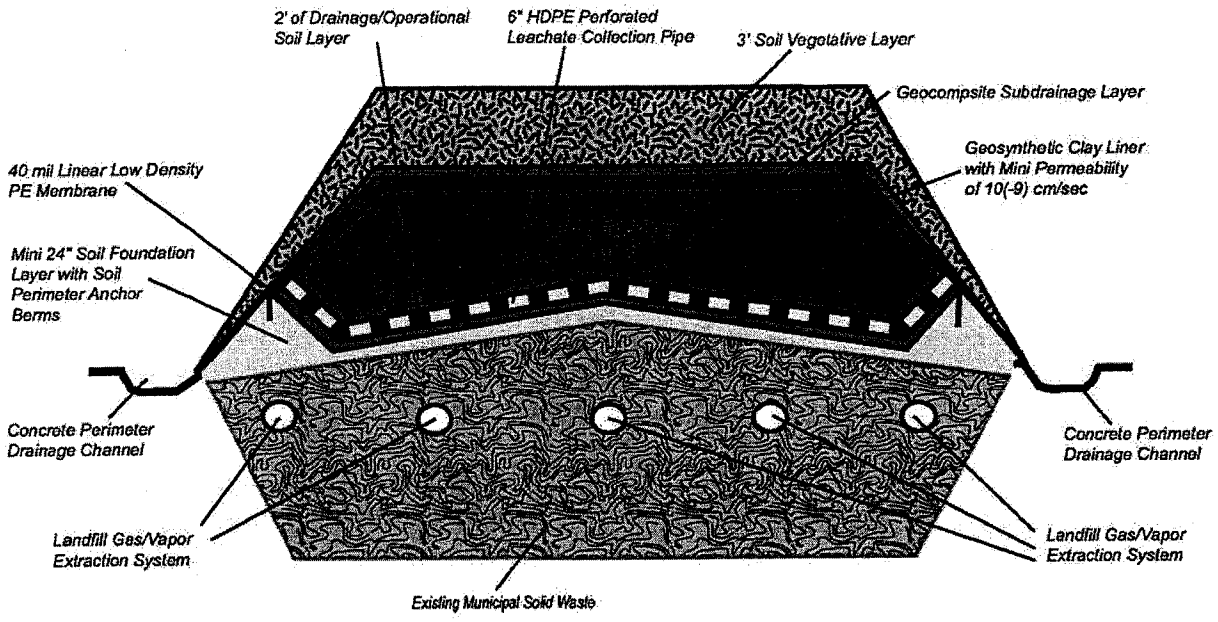
ONSITE
LAND USE MAP

PROJECT

Development Plan/
Coastal Development Permit
Unocal Corporation – D890558D

EXHIBIT

4: SML Vicinity Map



Non-Hazardous Hydrocarbon Impacted Soils Cross-Section

PROJECT
Development Plan/
Coastal Development Permit
Unocal Corporation – D890558D

EXHIBIT
5: SML Closure Cross-Section

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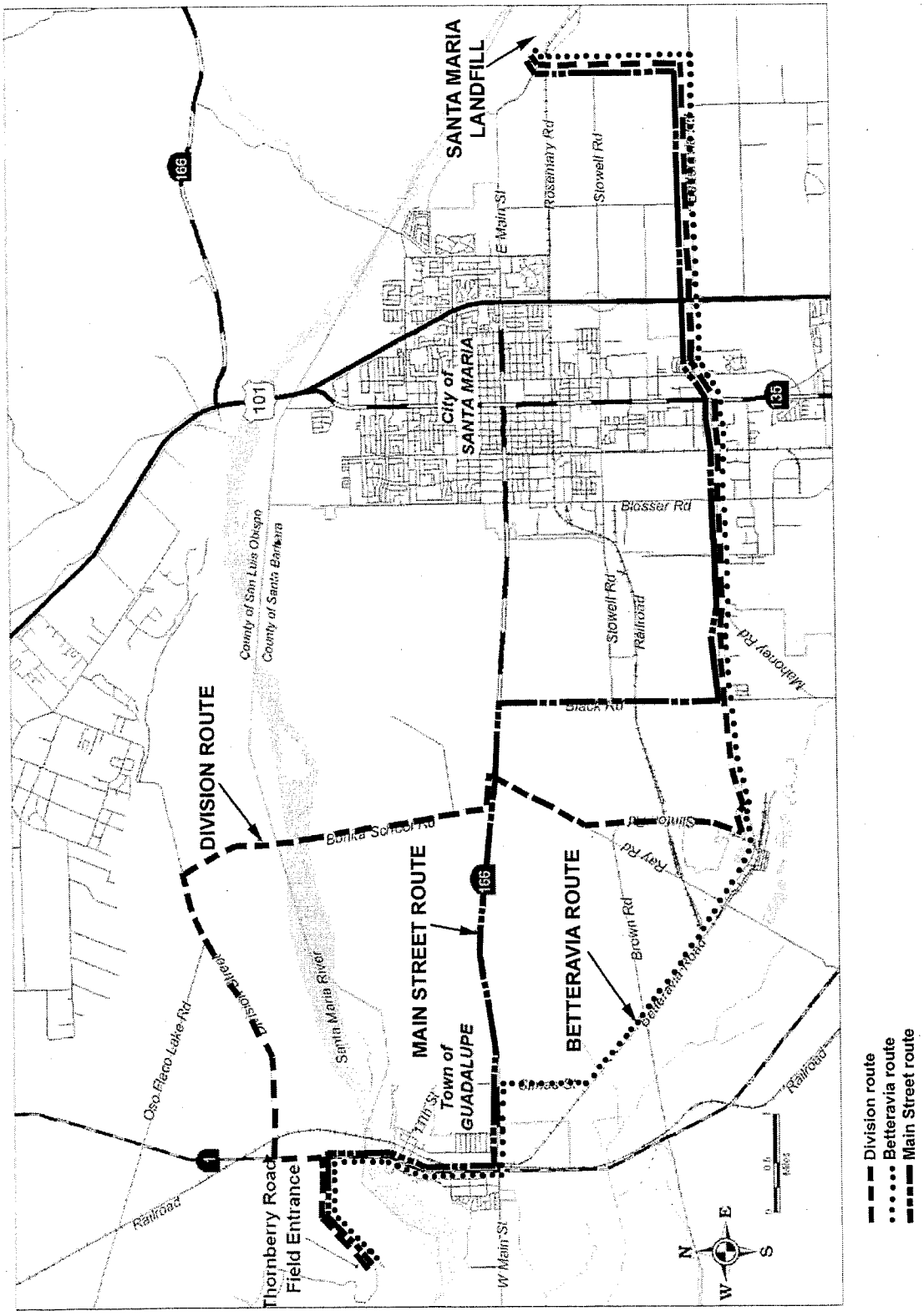
SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING



PROJECT

Development Plan/
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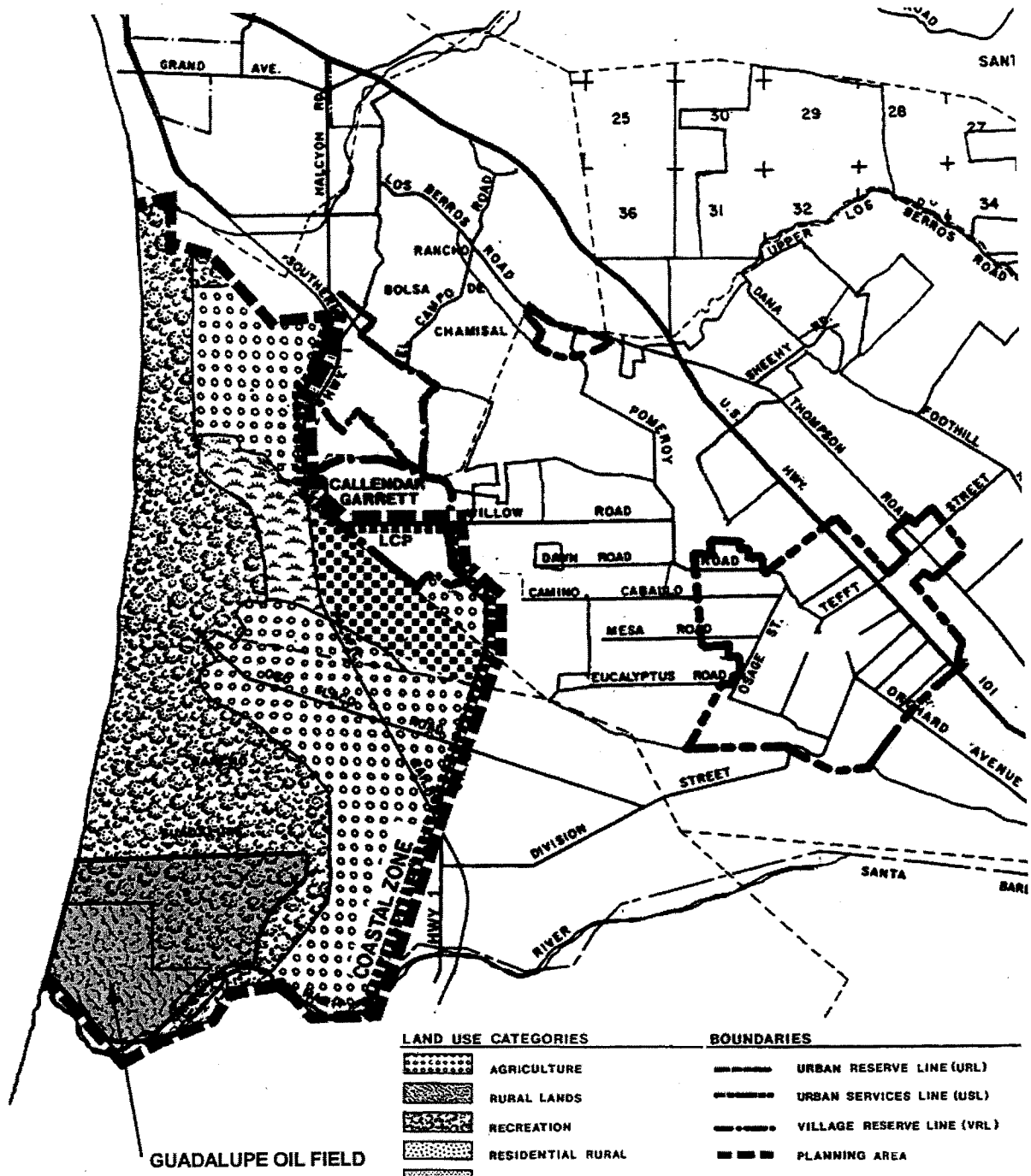
EXHIBIT

6: Routes to SML

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING



GUADALUPE OIL FIELD

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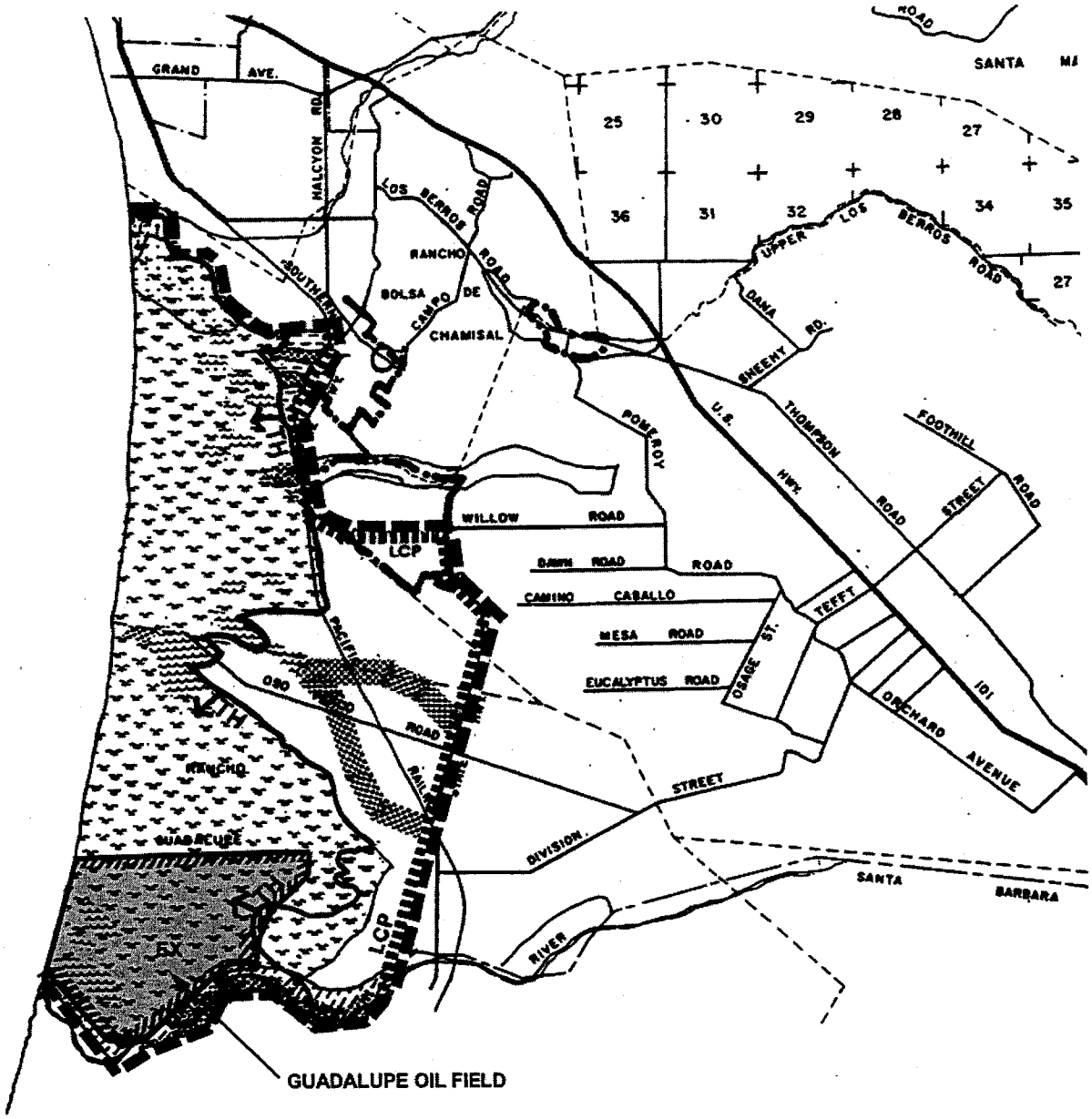
EXHIBIT
7: Land Use Category Map

2-70

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING



COMBINING DESIGNATIONS

	AR	AIRPORT REVIEW
ARCH-SEN	ARCH-SEN	ARCHAEOLOGICALLY SENSITIVE AREAS
GS	GS	GEOLOGIC STUDY AREA
FH	FH	FLOOD HAZARD
H	H	HISTORIC
EX	EX	ENERGY & EXTRACTIVE AREA
LCP	LCP	LOCAL COASTAL PLAN
V	V	VISITOR SERVING AREA
SRA	SRA	SENSITIVE RESOURCE AREA

PROPOSED PUBLIC FACILITIES

HS	HIGH SCHOOL
JHS	JR. HIGH SCHOOL
E	ELEMENTARY SCHOOL
	PARK
	POLICE OR PUBLIC SAFETY FACILITY STATION
WT	WATER TREATMENT FACILITIES
ST	SEWAGE TREATMENT FACILITIES
SW	SOLID WASTE FACILITIES
GF	GOVERNMENT FACILITY
L	LIBRARY

SENSITIVE RESOURCE AREAS THAT ARE ALSO ENVIRONMENTALLY SENSITIVE HABITATS

VTH	TERRESTRIAL HABITATS
	COASTAL STREAMS AND RIPARIAN VEGETATION
	WETLANDS
*	MARINE HABITAT

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EXHIBIT

8: Combining Designations

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING

1946-1994
Guadalupe Oil Field (GOF) – oil extraction and diluent spills.

↓

1998, March
SLO County certifies EIR that evaluates site-wide excavation and remediation using LTU.

↓

1998, November
RWQCB issues Clean-up or Abatement Order No. 98-38 to Unocal mandating excavation and treatment/disposal of contamination at GOF.

↓

1999, October
Excavations begin; material stockpiled at TB8 and TB9.
Some excavated soil used in LTU pilot studies.

↓

2000
Unocal and Multi Agency Coordination Committee (MACC) collectively agree that it may not be feasible to use LTU material for backfill at site.

↓

2000
All excavations and remediation temporarily halted.
Unocal agrees to evaluate other treatment/disposal options.

↓

2001
Unocal prepares and submits for review various treatment/disposal options.

↓

2003
Unocal decides to pursue disposal at Santa Maria Landfill (SML) as their preferred method of treatment/disposal of excavated material (proposed project).

↓

2003
SLO County initiates preparation of Supplemental EIR (to the 1998 EIR) because SML disposal option was not evaluated in the 1998 EIR.

↓

2005, January
SLO County circulates Draft SEIR for public comment.

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EXHIBIT
9: Project History Timeline